

Public Service Commission of Wisconsin

Summer Strand, Chairperson
Kristy Nieto, Commissioner

4822 Madison Yards Way
P.O. Box 7854
Madison, WI 53707-7854

Public Service Commission of Wisconsin
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March 26, 2024

To the Parties:

Re:	Inflation Reduction Act – Home Efficiency Rebates (HOMES)	9716-FG-2023
	Inflation Reduction Act - Home Electrification Appliance Rebates (HEAR)	9717-FG-2023

Comments Due:

Tuesday, April 16, 2024 - 1:30 pm

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

Address Comments To:

9716-FG-2023 Comments

Or

9717-FG-2023 Comments

Public Service Commission

P.O. Box 7854

Madison, WI 53707

The Public Service Commission (Commission) memorandum concerning the State of Wisconsin's Application for the U.S. Department of Energy's Home Energy Rebate Programs is being provided for public comment. Comments must be received by **1:30 pm CT on Tuesday, April 16, 2024**.

When filing comments, if the comments relate to the application materials for the HOMES program, please file those comments in docket 9716-FG-2023. If the comments relate to the application materials for HEAR, please file those comments in 9717-FG-2023. If the comments relate to the application materials for both HOMES and HEAR, please file your comments in both dockets.

Members of the public may file comments through the Commission's website. Click on the "File a Comment" button at the bottom of the website home page. On the public comments page, click on the "file a comment" hyperlink associated with this case (or "docket number," 9716-FG-2023 for HOMES and 9717-FG-2023 for HEAR). For the same instructions as noted in the paragraph above as to which docket or docket to file your comments in.

All comments will be posted to the Commission's Electronic Records Filing System (ERF).

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) 266-7375 or Jolene.Sheil@wisconsin.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Fontaine". The signature is fluid and cursive, with the first name "Joe" and last name "Fontaine" clearly distinguishable.

Joe Fontaine
Administrator
Division of Digital Access, Consumer and Environmental Affairs

JF:JP:kle DL:02004392

Attachment: Commission Memorandum 9716-FG-2023 and 9717-FG-2023 with Attachments

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

March 26, 2024

FOR COMMISSION AGENDA

TO: The Commission

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

RE: Inflation Reduction Act - HOMES Rebate Program 9716-FG-2023
Inflation Reduction Act - High-Efficiency Electric Home Rebate Program 9717-FG-2023

Suggested Minute:

The Commission directed staff to finalize the applications for the IRA Home Energy Rebate programs for submission to the U.S. Department of Energy (U.S. DOE) with modifications pursuant to its discussion and further modifications to incorporate feedback received from U.S. DOE to ensure alignment with the goals and guidance provided in the Inflation Reduction Act and U.S. DOE Guidance.

OR

The Commission did not direct staff to finalize the applications for the IRA Home Energy Rebate programs for submission to U.S. DOE and directed Commission staff to modify the proposal pursuant to its discussion and return the revised applications to the Commission.

Introduction

On August 16, 2022, President Joseph R. Biden signed the Inflation Reduction Act of 2022 into law (Pub. L. 117169).¹ In total, the law includes \$391 billion to support clean energy

¹ Inflation Reduction Act of 2022, H.R. 5376, 117th Cong. §§ 50121 and 50122 (2022): [PLAW-117publ169.pdf \(congress.gov\)](#)

and address climate change. This memorandum addresses two provisions of the IRA that together authorize more than \$8.5 billion nationwide that are relevant to this memorandum.

- Section 50121 authorizes \$4.3 billion in formula grants to State Energy Offices (SEOs) to carry out the Home Energy Performance-Based, Whole-House Rebates Program (HOMES).²
- Section 50122 authorizes \$4.275 billion in formula grants to State Energy Offices to carry out the Home Electrification and Appliance Rebate Program (HEAR).³

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 Wisconsin SEO was informed in November 2022 that it is eligible to receive the following estimated amounts in formula funding to implement the HER programs:⁴

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

The HOMES program is a whole home energy efficiency program. There are two potential pathways for households receiving HOMES rebates: rebates based on modeled energy savings or rebates based on measured energy savings. Low-income households are eligible to

² The Department of Energy has evolved its terminology and now refers to IRA Section 50121 as Home Efficiency Rebates. Wisconsin has been referring to Section 50121 as HOMES since the IRA was passed and has created strong awareness of the program name. The Department of Energy has communicated to staff that it is acceptable for Wisconsin to continue to refer to Section 50121 as HOMES but requests to make clear that what Wisconsin refers to as HOMES, the Department of Energy refers to as Home Efficiency Rebates.

³ This program has also been acronymized as HEEHRA, including in past communications with the Commission. The Department of Energy has evolved its language for this program and now refers to this program as the Home Electrification and Appliance Rebate (HEAR) program. Wisconsin has adopted this naming convention for the sake of consistency with the U.S. DOE and other state programs.

⁴ [Biden-Harris Administration Announces State and Tribe Allocations for Home Energy Rebate Program | Department of Energy](#)

receive higher total rebate amounts for projects completed under either HOMES path. The primary objective of HOMES is to save energy.

Under HEAR, specified appliance and non-appliance upgrades are eligible for rebates. These upgrades are referred to as qualified electrification projects. Appliances must be ENERGY STAR certified to qualify for a HEAR rebate. Non-appliance upgrades eligible under HEAR are designed to be complementary with the appliance upgrades, as those appliance upgrades are intended to electrify certain household end uses of energy and, therefore, may add electric load to the home. Low-income households are eligible to receive higher rebates for qualified electrification projects under HEAR.

The HER programs must align with the Justice40 Initiative⁵ (Justice40) and ensure that at least 40 percent of program benefits flow to Disadvantaged Communities (DACs). By default, DACs for the HER programs are those households located within an area identified by the Climate and Economic Justice Screening Tool (CEJST).⁶ The HER program definition of a low-income household is a household that earns below 80 percent of area median income (AMI).

The Commission's Order of May 3, 2023 in docket 5-FE-104 directed Focus on Energy (Focus) to implement the HER programs in Wisconsin on behalf of the SEO. ([PSC REF#: 466844](#).) Order Point #3 of the Order requires that the full Commission review the fully detailed application for the IRA HER implementation funds prior to submission to the United States Department of Energy (U.S. DOE). This memorandum addresses the applications for both IRA HER programs. The draft application package for both programs are provided as attachments to this memorandum and include the following materials:

⁵ See [Justice40 Initiative | Department of Energy](https://www.energy.gov/justice/justice40-initiative), <https://www.energy.gov/justice/justice40-initiative>.

⁶ See <https://screeningtool.geoplatform.gov/en/#/3/33.47/-97.5>

- Application narratives for the HOMES and HEAR programs;
- Implementation Blueprints:
 - Community Benefits Plans for HOMES and HEAR;
 - Consumer Protection Plans for HOMES and HEAR;
 - Education and Outreach Strategy Plans for HOMES and HEAR;
 - Utility Data Access Plan for HOMES;
- Stakeholder Engagement Summary Report.⁷

This memorandum also presents the Commission with decision points representing policy choices where the IRA and the U.S. DOE’s Program Requirements and Application Instructions⁸, heretofore referred to as U.S. DOE Guidance, affords states discretion to customize the programs to best meet their priorities. Should the Commission approve the application packages for submission with decisions that differ from what is drafted in the attached materials, staff will modify the draft materials to reflect the Commission’s decisions before proceeding with submission to the U.S. DOE.

Planning and Stakeholder Engagement

The U.S. DOE released a formula grant application opportunity on March 23, 2023 inviting states to apply to receive a portion of the available administrative funds for the HOMES and HEAR programs to perform planning and administrative activities in preparation for submitting applications and program plans.⁹ Wisconsin submitted an application to the U.S.

⁷ The Stakeholder Engagement Summary Report is not a required component of the State of Wisconsin’s application package.

⁸ Department of Energy, Office of State and Community Energy Programs. October 13, 2023. *Home Energy Rebate Programs Requirements and Application Instructions*. <https://www.energy.gov/scep/articles/home-energy-rebate-programs-requirements-and-application-instructions>.

⁹ Department of Energy, Office of State and Community Energy Programs. March 23, 2023. *Home Energy Rebate Programs Early Administrative Funds ALRD State Allocations*. <https://www.energy.gov/scep/articles/home-energy-rebate-programs-early-administrative-funds-alrd-state-allocations>.

DOE for its full allocation of early administrative funds on July 10, 2023. The U.S. DOE notified the SEO of its approval of the state's application for these planning funds on September 22, 2023 (\$1,406,525 for HOMES and \$1,096,399 for HEAR). These planning funds are an advance on the total allocation Wisconsin receives from U.S. DOE for the HOMES and HEAR programs. On October 30, 2023, the Commission issued a Letter of Intent to APTIM, the Focus third-party administrator, authorizing the firm to begin the work of planning for the HER programs. ([PSC REF#: 483058](#).) A subsequent letter, authorizing additional funds to perform program planning, was issued on January 29, 2024. ([PSC REF#: 489828](#).)

During the planning period, Commission staff worked with the SEO Delegated Commissioner to define the strategic objectives and core principles for program design and delivery which would be used throughout the planning process. Those principles include the following:

1. The program should leverage existing Focus on Energy infrastructure to maximize administrative efficiency and improve customer experience while maintaining appropriate separation, per Commission order;¹⁰
2. The program will target rebates to customers where up-front costs have been barriers to participating in Focus on Energy and particularly, in areas of the state with high energy burden and service territories that depend on delivered fuels;
3. The rebate experience should be simple and clear for all participants (customers, contractors, distributors & retailers);
4. Customer eligibility requirements, product and project requirements and other processes should be well documented and easily understood;
5. Electrification projects should result in reduced household energy bills;
6. Program planning and implementation will be transparent and offer opportunities for stakeholder input and public comment;
7. Program design should support long-term workforce development opportunities and leverage contractor training grant funding where possible.

¹⁰ Order Point 2 of the Commission's order of May 3, 2023 establishes that the IRA HER programs shall be funded and managed as separate programs and shall not be included in the Focus portfolio. ([PSC REF#: 466844](#) at 5.)

Planning during the fall and winter focused on detailed review of the U.S. DOE Guidance. The U.S. DOE Guidance provides states with definitions of terms and detailed information on program requirements. In addition to the U.S. DOE Guidance, the U.S. DOE provided states with a host of additional application resources and supplemental documents to consult and serve as additional guidance during program planning and design.¹¹ The U.S. DOE continues to develop and release application resources and supplemental materials on a rolling basis as states across the country work through the various stages of program planning and application development.

Concurrent to the review of U.S. DOE Guidance and planning for the core requirements of the programs, APTIM and Commission staff coordinated on a variety of stakeholder outreach and engagement efforts designed to educate stakeholders on the programs and gather input on program design. APTIM planned and delivered a series of stakeholder engagement sessions across Wisconsin throughout January and February. The sessions included five in-person and two virtual interactive meetings open to the public along with eight Trade Ally breakfasts targeted towards contractors who already work on Focus-related projects and/or may be interested in participating in projects supported by the IRA HER programs. These stakeholder sessions were accompanied by an online survey seeking input on key program design considerations. The survey was posted to the IRA Home Energy Rebates section of the Focus website¹² and promoted on Focus' social media outlets. Details on these sessions and results from the online survey can be found in the Stakeholder Engagement Summary Report included

¹¹ Department of Energy, Office of State and Community Energy Programs. *Home Energy Rebates Application Guidance*. <https://www.energy.gov/scep/home-energy-rebates-application-guidance>.

¹² <https://focusonenergy.com/home-energy-rebates>.

as an attachment to this memorandum. During this planning period, APTIM and Commission staff also met directly with a number of program stakeholders to discuss the HER programs.¹³

IRA HER Program Policy Questions for Commission Decision

The U.S. DOE has identified multiple aspects of HER program design where states have flexibility to customize the programs to best support each state's residents. The sections below present the Commission with an analysis of policy areas staff have identified where discretionary decisions are important to determine the guiding priorities and direction for Wisconsin's version of the HER programs. The Application Narratives and Implementation Blueprints included in Wisconsin's application package outline many of the implementation strategies Wisconsin intends to use to deliver its HER programs to households throughout the state. The Wisconsin HER program application package will be modified, as necessary, to reflect the Commission's decisions on the topics presented in this memorandum, as well as any additional modifications identified by the Commission based on its review of the application materials and public comments received.

The discussion below begins with decisions impacting the design of the HEAR program. First, the Commission is presented with options for which upgrades to include in Wisconsin's HEAR program followed by decisions specifying the rebate amounts for these upgrades. Next, staff present the Commission with an analysis of options for establishing priority/priorities for heat pump rebates based on household type. Finally, options for setting contractor rebate

¹³ Stakeholder meetings were held with the Department of Administration's Division of Energy, Housing and Community Resources (DEHCR), the Wisconsin Local Government Climate Coalition (WLGCC), Focus utility partners, the Statewide Energy Efficiency and Renewables Administration (SEERA), the Wisconsin Housing and Economic Development Authority (WHEDA), the Wisconsin Electric Cooperative Association (WECA), the Office of Clean Energy and Sustainability (OSCE), Weatherization Operators of Wisconsin (WOW), Rocky Mountain Institute (RMI) and Walnut Way Conservation Corp.

amounts for installation of qualified electrification projects are presented for the Commission's consideration.

Following the discussion of HEAR program design topics, staff present the Commission with an analysis of certain HOMES program design decisions. The first program design decision for the Commission is whether to implement one or both options for HOMES program implementation design. Following this discussion, the Commission is presented with a number of program design decisions that will determine how to prioritize low-income households for Wisconsin's HOMES program. These decision areas include: whether to increase HOMES rebate amounts for low-income households, whether to decrease HOMES rebate amounts for households earning more than 150 percent AMI, and whether to limit HOMES eligibility to only serve low-to moderate-income customers during the program's initial phase.

Following these program-specific sections, staff present the Commission with cross-cutting decision areas including rebate budget allocations for both HOMES and HEAR and general program requirements guidance. The memorandum concludes by seeking the Commission's direction regarding the process for making future HER program modifications.

Upgrades Eligible for HEAR Rebates

IRA Section 50122 establishes the appliance and non-appliance upgrades eligible in the HEAR program and their respective rebate caps. Eligible upgrades include:

- Heat pumps for space heating and cooling
- Heat pump water heaters
- Heat pump clothes dryers
- Electric stoves, cooktops, ranges, or ovens
- Electric load service centers (electrical panels)

- Electric wiring
- Insulation, air sealing, and ventilation

Insulation, air sealing and ventilation are included among eligible HEAR upgrades because they can help improve the performance of heat pumps and support right-sizing of equipment.

Customers are only eligible to receive insulation, air sealing, and ventilation rebates from either HOMES or HEAR, and cannot receive rebates for those measures from both programs.

States are not required to offer rebates for all technologies identified within the IRA.¹⁴

States have discretion to choose which upgrades its HEAR program offers and the rebate amounts for those upgrades up to the maximum rebate amount allowed under IRA.¹⁵ Additional program controls must also be described in the application to the U.S. DOE to ensure the following:

- HEAR rebates do not total to more than \$14,000 per household;
- HEAR rebates do not exceed 50 percent of the cost of qualified electrification projects for households earning between 80 and 150 percent of AMI;
- HEAR rebates do not exceed 100 percent of the cost of qualified electrification projects for households earning less than 80 percent of AMI.

APTIM sought input during its stakeholder engagement sessions to gauge interest in each of the upgrades eligible for a rebate under HEAR. While certain upgrades were of greater interest than others, stakeholders expressed high levels of interest in all upgrades being eligible. Stakeholders were most interested in insulation and air sealing, followed by heat pumps for space heating and cooling, and then heat pump water heaters. The upgrades garnering the least

¹⁴ Department of Energy. Office of State and Community Energy Programs. *Home Energy Rebates Frequently Asked Questions*. FAQ #27. [Home Energy Rebates Frequently Asked Questions | Department of Energy](#)

¹⁵ *Ibid*, FAQ #23.

interest (though still high interest overall) were ventilation improvements, heat pump clothes dryers, and electric panel upgrades.

Limiting the types of technologies eligible for HEAR rebates would extend the budget availability for rebates applied to the technologies the state offers within its program. Conversely, electing to exclude a certain technology or technologies from the program may preclude the state from accelerating market adoption for those upgrades. Non-appliance upgrades for electric panel and wiring eligible under HEAR are intended to be complementary to the electrification of space and water heating by covering a portion of the contractor costs that are often needed to accommodate additional electric load in the home. A decision to offer rebates for appliance upgrades without also offering their complementary non-appliance upgrades may reduce interest in the program from potential participants interested in doing both.

Commission Alternatives – Upgrades Eligible for HEAR Rebate

Under Alternative One, the Commission may choose to include all eligible upgrades in Wisconsin's HEAR program. Under Alternative Two, the Commission may choose to include only a subset of eligible measures, consistent with its discussion. The Commission may also choose to remand the matter back to Commission staff under Alternative Three if the Commission requires additional information to make its decision.

Alternative One: Wisconsin's HEAR program shall offer rebates for all upgrades eligible under IRA Section 50122.

Alternative Two: Wisconsin's HEAR program shall offer rebates for a subset of all upgrades eligible under IRA Section 50122, pursuant to the Commission's discussion.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

HEAR Program Rebate Amounts

The IRA establishes maximum rebate amounts for qualified electrification projects eligible under the HEAR program. Households below 80 percent AMI can earn a rebate of 100 percent of project costs up to \$14,000 and households between 80 percent and 150 percent AMI can earn a rebate of 50 percent of project costs up to \$14,000. The maximum rebate amounts are shown in Table 1 below.

Table 1. HEAR Program Maximum Rebates

Type of Home Energy Project	Households below 80% AMI	Households between 80% and 150% AMI
Home Electrification Project Qualified Technologies Eligibility is limited to households with an income below 150% AMI	100% of project costs up to \$14,000	50% of project costs up to \$14,000
	ENERGY STAR electric heat pump for space heating or cooling	Up to \$8,000
	ENERGY STAR electric heat pump water heater	Up to \$1,750
	ENERGY STAR electric heat pump clothes dryer	Up to \$840
	ENERGY STAR electric stove, cooktop, range, oven	Up to \$840
	Electrical load service center (electrical panel)	Up to \$4,000
	Electrical Wiring	Up to \$2,500
	Insulation, air sealing, ventilation	Up to \$1,600

States have the flexibility to set HEAR program rebate amounts for each individual upgrade in a manner aligned with their program priorities, up to the maximum amount allowed in the IRA. APTIM presented information on HEAR program rebate amounts at in-person and virtual stakeholder sessions held throughout January and February. The APTIM program team sought input from stakeholders to understand their preferences for HEAR program rebate amounts at these events and through an online survey. There were mixed opinions among participants in APTIM’s online survey and in-person stakeholder events regarding preferred rebate levels. Some respondents favored maximizing rebate amounts for households most likely to experience the greatest barriers to participation due to high upfront costs of the upgrades (i.e., low-income households), while others stated they would prioritize seeing program rebates

reaching as many households as possible. In part due to these mixed opinions, the planning team did not propose any alternative rebate amounts in the draft application.

Commission Alternatives – HEAR Rebate Amounts

The Commission may want to consider establishing rebate amounts that are less than the IRA maximum if it concludes that certain upgrades are of lower priority for the State. Setting rebate amounts that are less than the IRA maximum for certain upgrades may allow Wisconsin to extend its HEAR rebate budget for installations of higher priority upgrades in low-to moderate-income households statewide. Alternatively, the Commission may decide Wisconsin’s program should offer the maximum rebate amounts as set forth in the IRA for all upgrades. These amounts have been widely publicized since the IRA was passed. Directing Wisconsin to offer rebate amounts that are different from the IRA maximum may risk confusion, at least initially, among consumers, contractors, and other stakeholders.

The Commission’s decision in the preceding section established which upgrades are to be included as part of the Wisconsin’s HEAR program. Therefore, its decisions below determining which upgrades are or are not offered at the maximum rebate amount authorized by the IRA will only apply to those upgrades the Commission determined are appropriate for the Wisconsin HEAR program to offer.

Alternative One: Wisconsin’s HEAR program shall offer the IRA maximum rebates for all eligible upgrades, consistent with Table 1.

Alternative Two: Wisconsin’s HEAR program shall offer rebate amounts that are less than the IRA maximum for those upgrades selected below. The rebate amounts for the upgrades selected shall be set consistent with the Commission’s discussion:

Sub-Alternative A: Heat pumps for space heating and cooling

Sub-Alternative B: Heat pump water heaters

Sub-Alternative C: Heat pump clothes dryer

Sub-Alternative D: Electric stove, cooktop, range, or oven

Sub-Alternative E: Electric load service center (electrical panel)

Sub-Alternative F: Electric wiring

Sub-Alternative G: Insulation, air sealing, and ventilation

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

Households Eligible for HEAR Heat Pump Rebates

The discussion and analysis in this section is provided to seek the Commission's direction regarding which residential customer segment(s) will be eligible to receive HEAR rebates for heat pumps for space heating and cooling. In the event that the Commission determines above that Wisconsin's HEAR program will not offer rebates for heat pumps for space heating and cooling, the decisions in this section are not applicable.

In addition to a state's ability to establish the types of upgrades eligible for HEAR and their corresponding rebate amounts, the U.S. DOE's guidance affords states the flexibility to narrow the scope of the program to particular household types.¹⁶ Previous research in Wisconsin has identified certain types of households that may experience the greatest bill reduction impacts as a result of electrification of space heating, including households whose primary heating source is delivered fuels (i.e., propane, fuel oil, and wood) and households whose primary heating

¹⁶ *Ibid*, FAQ #65.

source is electric resistance heat, in large part due to the higher costs associated with those heating needs compared to natural gas.¹⁷

The Center for Energy and Environment's (CEE's) 2021 analysis for Focus¹⁸ found customers with existing propane furnaces may save up to \$531 on annual heating costs by switching to an air source heat pump (ASHP). CEE's study also found that single family homes with existing electric resistance heating may save up to \$705 on annual heating costs by switching to a heat pump while multifamily households with existing electric resistance heating may save up to \$417 on their annual heating costs by retrofitting with a heat pump. Conversely, CEE's analysis found that households with existing natural gas furnaces that install an ASHP may experience increased average heat costs increase by as much as \$155 per year, depending on the outdoor temperature at which the household switches from using the heat pump to using the natural gas furnace to heat their home. It should be noted that CEE's study did not examine cost impacts for customers heating with fuel oil nor did it factor in the cost savings that may be realized when a customer cools their home with a heat pump versus central or window air-conditioners.

CEE's study further noted that households heating with propane face adoption barriers due to smaller local contractor bases and more limited opportunities for heat pump incentives. In addition, those customers face limitations to Focus participation. Households heating with propane that are not a customer of a participating Focus utility are not eligible for heat pump incentives from Focus. Households heating with propane that are customers of a participating electric utility receive reduced Focus heat pump incentives compared to customers heating with

¹⁷ Center for Energy and Environment and Elevate Energy. October 2021. *Focus on Energy EERD Report: Air Source Heat Pumps in Wisconsin Multifamily and Single-Family Applications*. https://s3.us-east-1.amazonaws.com/focusonenergy/staging/inline-files/2021/EERD_ASHP_Project-Final_Report.pdf.

¹⁸ *Ibid.*

natural gas; Focus cannot claim the savings from the reduction in propane consumption because the savings do not accrue to a participating utility. ([PSC REF#: 453081](#) at 18.)

CEE also found that multifamily customers with electric resistance heating face particularly high barriers to participating in Focus’ offerings for heat pumps. Electric resistance is an expensive way to heat relative to other fuels and customers in this segment can be expected to have among the highest energy burdens in the state.¹⁹

Slipstream’s ASHP 2023 market transformation research, funded through the Commission’s Energy Innovation Grant Program (EIGP),²⁰ also found that customers on delivered fuels and customers relying on electric resistance heat are among the most immediate markets to prioritize in Wisconsin, in addition to other customer segments identified through a set of screening criteria outlined within the study. Table 2 shows Slipstream’s top five heat pump adoption opportunities in Wisconsin.

Table 2. Top Five Immediate Air-Source Heat Pump Opportunities in Wisconsin

Opportunity	Carbon reduction	Customer economic benefit	Equitable adoption	Building technology momentum
Single-family dual fuel natural gas displacement (AC replacement)	High	Low	Low	High
Single-family dual fuel propane displacement (AC replacement)	High	High	Moderate	High
Single-family all-electric new construction	Low	Moderate	Low	High
Multi-family all-electric new construction	Low	Low	High	High
Multi-family electric resistance heat	Moderate	Moderate	High	High

Source: Slipstream, CEE and Elevate. Planning for Wisconsin Air Source Heat Pump Market Transformation.

¹⁹ *Ibid* at p. 12.

²⁰ Slipstream, Center for Energy and Environment, and Elevate. July 2023. Planning for Wisconsin Air Source Heat Pump Market Transformation. Supported by Wisconsin’s Energy Innovation Grant Program (EIGP), Agreement Number: EIGP-2021-36. [PSC REF#: 472912](#).

Table 3 shows the number of Wisconsin households by primary heating fuel as reported by the U.S. Environmental Protection Agency (U.S. EPA).²¹

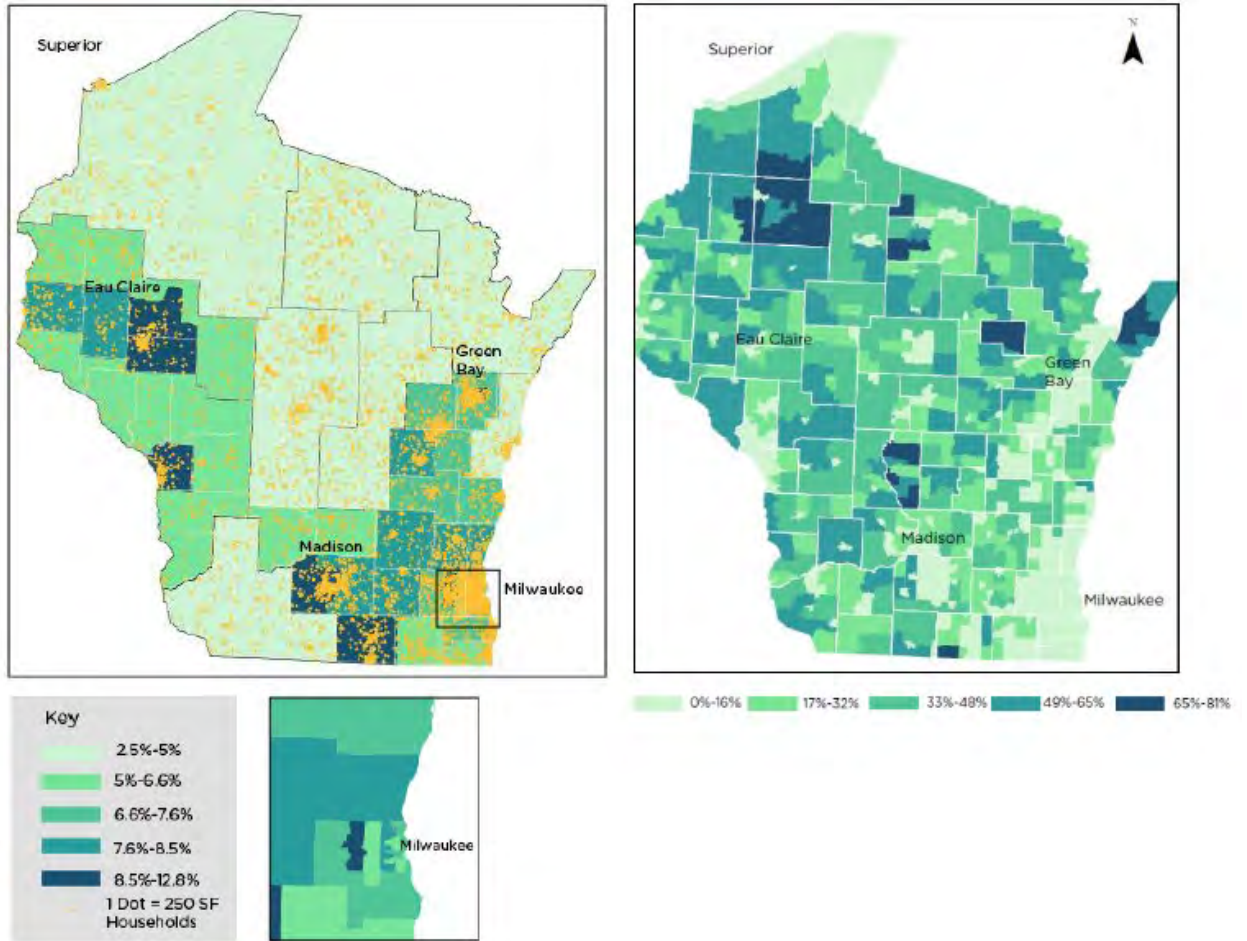
Table 3. Wisconsin Households Primary Heating Fuel

Primary Heating Fuel Use	Housing Units	% of Housing Units
Natural Gas	1,552,370	65%
Electricity	387,271	16%
Propane	276,989	12%
Wood	78,901	3%
Fuel Oil, Kerosene	44,254	2%
Other	21,727	1%
No Fuel	15,080	1%
Solar	839	0.04%
Coal and Coke	504	0.02%
Total	2,377,935	100%

Households heating with propane tend to be located in rural areas and in northern Wisconsin, while households heating with electric resistance are more evenly distributed across Wisconsin. Single family households are more likely to heat with propane than multifamily households, and multifamily households are more likely to heat with electric resistance than single family. CEE’s 2021 study for Focus presented the maps shown in Figure 1 below to illustrate the geographic distribution of single-family homes heating with electric resistance (left map) and single-family homes heating with propane (right map).

²¹ US EPA Home Heating Fuel Use by Census Tract.
<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=044e6d58b4f045bf9059cba0a76d059b>.

Figure 1. Percentages of Single-Family Homes with Electric Resistance Heating (Left) and Propane Heating (Right)²²



APTIM sought input during its stakeholder engagement sessions regarding whether and how HEAR rebates should be targeted to Wisconsin households. A moderate number of responses indicated a preference to serve households that have historically been ineligible to participate in Focus. Participants at several locations also expressed interest in setting rebate amounts based on their anticipated impact.

²² Center for Energy and Environment and Elevate Energy. October 2021. *Focus on Energy EERD Report: Air Source Heat Pumps in Wisconsin Multifamily and Single-Family Applications*. https://s3.us-east-1.amazonaws.com/focusonenergy/staging/inline-files/2021/EERD_ASHP_Project-Final_Report.pdf.

Commission Alternatives: Households Eligible for HEAR Heat Pump Rebates

The Commission may consider whether to make heat pump rebates available to all eligible participants or narrow the program's scope to target certain types of households to align with its priorities and/or recent research efforts. This decision may be considered in the context of the research results discussed above and two of the strategic objectives and core principles established by the Delegated Commissioner during the planning process: 1) the program will target rebates to customers where up-front costs have been barriers to participating in Focus on Energy and particularly, in areas of the state with high energy burden and service territories that depend on delivered fuels, and 2) electrification projects should result in reduced household energy bills.

Alternative One would affirm all participants are eligible, and may be appropriate if the Commission does not wish to narrow the scope of program eligibility for heat pump rebates and ensure rebates are available as broadly as possible. Alternative Two may be appropriate should the Commission wish to consider narrowing the scope for HEAR program heat pump rebates to those households in the state that will experience the greatest bill reduction impacts as a result of electrification of space heating: households whose primary heating source is delivered fuels (i.e., propane, fuel oil, and wood) and households whose primary heating source is electric resistance heat. The Commission may select one or both types of households from the sub-alternatives under Alternative Two based on its priorities for the program. Sub-alternatives are also provided to select households heating with natural gas and single family and multifamily new construction as eligible for heat pump rebates, to reflect the other priorities identified in Slipstream's research. Alternative Three may be appropriate if the Commission wishes to narrow the scope of eligibility for HEAR heat pump rebates based on different priority considerations beyond the offered sub-

alternatives. Alternative Four may be appropriate if the Commission needs additional information necessary to inform its decision and wishes to direct staff to follow-up at a later date.

Alternative One: The State of Wisconsin shall make HEAR program rebates for heat pumps for space heating and cooling available to all eligible households.

Alternative Two: Only the following types of households shall be eligible for rebates for heat pumps for space heating and cooling under Wisconsin's HEAR program (one or multiple options may be selected):

Sub-Alternative A: Existing single family and multifamily households whose primary heating source is delivered fuels (i.e., propane, fuel oil, wood).

Sub-Alternative B: Existing single family and multifamily households whose primary heating source is electric resistance heat.

Sub-Alternative C: Single family new construction.

Sub-Alternative D: Multifamily new construction.

Sub-Alternative E: Existing single family and multifamily households whose primary heating source is natural gas.

Alternative Three: Other action consistent with the Commission's discussion.

Alternative Four: Remand the matter back to staff for additional information consistent with the Commission's discussion.

HEAR Contractor/Eligible Entity Bonus Amounts

IRA Section 50122(c)(5)(A) requires that states provide a rebate to eligible entities that perform the installation of an applicable qualified electrification project that is separate from, and in addition to, the rebate associated with the upgrade (discussed in the HEAR Program Rebate Amounts section above). The IRA defines an eligible entity as each of the following:

- A. a low-or moderate-income household;
- B. an individual or entity that owns a multifamily building not less than 50 percent of the residents which are low- or moderate-income households; and
- C. a governmental, commercial, or nonprofit entity, as determined by the Secretary, carrying out a qualified electrification project on behalf of an entity described in A or B.

Given the definition above, installation rebates can be received by a member of the household performing their own installation, by a multifamily building owner performing the installation(s) at their property, by a local or state government performing the installation, by a commercial contractor performing the installation, or by a nonprofit organization performing the installation. Per U.S. DOE guidance, an eligible entity representative (governmental, commercial, or nonprofit) that applies for and receives a rebate on behalf of an eligible entity and performs the installation of the qualified electrification project shall receive an incentive payment not to exceed \$500 in addition to the available rebate.²³

The qualifying activities and maximum incentives allowed in the U.S. DOE guidance are shown in the middle column of Table 4. The right-hand column of Table 4 shows the proposed maximum Wisconsin incentives in the draft plan. The proposed incentives are identical to the maximum incentives allowed by U.S. DOE with the exception of the installation of one or more electric heat pumps for space heating and cooling per dwelling unit – ducted. The planning team proposed to set equal bonus incentives for contractors and eligible entities installing ducted and unducted heat pumps for space heating and cooling for purposes of administrative simplicity.

²³ [home-energy-rebate-programs-requirements-and-application-instructions_10-13-2023.pdf](#) at pg. 73

Table 4. HEAR Contractor/Eligible Entity Bonus Amounts

Qualifying Activity	Maximum Incentive Allowed by U.S. DOE	Proposed Maximum Wisconsin Incentive
Substantial installation located within a disadvantaged community (excludes installations of electric stoves and electric heat pump dryers) per dwelling unit	\$200	\$200
Installation of one or more electric heat pump water heaters	\$150	\$150
Installation of one or more electric heat pumps for space heating and cooling per dwelling unit – <i>ducted</i>	\$300	\$200
Installation of one more electric heat pumps for space heating and cooling per dwelling unit – <i>unducted</i>	\$200	\$200
Installation of one electric stove, cooktop, range, or oven	\$0	\$0
Installation of one electric heat pump clothes dryer	\$0	\$0
Installation of one or more electric load service center	\$150	\$150
Installation of insulation per dwelling unit	\$150	\$150
Installation of air sealing and materials to improve ventilation per dwelling unit	\$150	\$150
Installation of electric wiring per dwelling unit	\$150	\$150

Commission Alternatives – HEAR Contractor/Eligible Entity Bonus Amounts

Alternative One: The State of Wisconsin shall design its HEAR program to offer contractor/eligible entity bonus amounts consistent with the Proposed Maximum Incentive amounts in Table 4.

Alternative Two: The State of Wisconsin shall design its HEAR program to offer contractor/eligible entity bonus amounts that are different than the Incentive amounts proposed

in Table 4 for those upgrades selected below. The installation rebate amounts for the upgrades selected shall be set consistent with the Commission's discussion.

Alternative Three: Remand the matter back to Commission staff for additional information.

HOMES Program Design and Policies

The next several sections of this memorandum present an analysis of certain HOMES program design and policy areas for the Commission's consideration. The issues discussed in these sections are presented as discrete program design and policy decisions, however, since they are all aspects of the same program, they are inextricably linked. Where possible, staff attempt to identify how the Commission's decision for one issue may relate to a decision on another issue.

A number of issues concern HOMES program design modifications for Wisconsin related to impacts on low-income households, which several aspects of U.S. DOE Guidance identify as a priority to serve through the program. Specifically, staff present the Commission with decisions on whether to increase the HOMES rebate amounts for low-income households (those earning less than 80 percent AMI), whether to decrease the HOMES rebate amounts for households earning more than 150 percent AMI, and whether to limit initial program eligibility to only serve low- and moderate-income households (those earning less than 150 percent AMI). Following the analysis of these program design areas, staff present the Commission with an option to establish a HOMES rebate funding allocation target for low-income households that is greater than the minimum amount set by the U.S. DOE.

HOMES - Modeled versus Measured Program Path

IRA Section 50121 establishes two potential approaches states can take in their implementation of the HOMES program: the Modeled program path and the Measured program path. States can elect to offer residents the opportunity to participate in one pathway or both pathways. The sections below describe the different program pathways and key factors states may consider when deciding which program pathways to offer.

Modeled Program Path

Under the Modeled program path, a customer wishing to participate in the program must first complete a home energy assessment, performed by a qualified contractor, using a calibrated home energy model consistent with the Building Performance Institute (BPI)-2400 standard to estimate potential energy savings prior to the upgrades.²⁴ The output of the BPI-2400 model provides the customer with information on the home improvements that could be performed to achieve various levels of energy savings. The rebate amount available to the household is dependent on the level of savings calculated for the home improvements completed. The IRA requires customers to complete projects that will generate a modeled savings of at least 20 percent and include at least one major upgrade.²⁵ Higher rebates are available to customers performing work modeled to result in at least 35 percent savings.

Currently, Focus does not administer a model-based whole home energy efficiency offering. Focus' current program design offers a set incentive amount for residential whole home (i.e., insulation and air sealing) projects and HVAC projects that meet general program requirements. Prior to this program design, until 2019, Focus administered a model-based

²⁴ Alternatives to BPI-2400 may be needed for some applications (multifamily, customers using delivered fuels etc.)

²⁵ U.S. DOE Guidance defines major upgrade as “energy usage, equipment, technologies, and services related to heating and cooling, envelope, and water heating end uses.”

residential whole home offering that required participants receive a home energy assessment before installing any eligible whole home measures. With this offering a contractor registered as a Focus Trade Ally performed an assessment, reported the results to the homeowner, and provided estimated incentive amounts for potential improvements based on the modeled savings and that participant's income. Focus transitioned to a prescriptive rebate approach for its whole home measures in 2020 partly due to a desire to deliver a simplified program experience to its customers and partly due to program evaluation findings that model-estimated savings in many cases exceeded with savings verified by the Focus third-party evaluator.

The determination of appropriate program designs for whole-home efficiency offerings is informed by the value a state places on knowing the actual savings resulting from a project before paying a rebate versus its comfort in distributing rebates based on model estimates. A 2017 evaluation of the model-based Focus whole home path showed mixed results with respect to the accuracy of the modeling software used for the Focus program. The Focus Evaluator found that the models accurately estimated electric savings for standard income households but underestimated electric savings for income-qualified customers.²⁶ Additionally, the Focus Evaluator determined that the models overestimated natural gas savings for both standard income and income-qualified customers. Table 5 shows the results of the 2017 evaluation of the performance of the Snugg Pro model used for the Focus whole home model-based program. The column labeled "Model Performance" shows the degree to which the Snugg Pro model over-or under-estimated savings verified using a billing analysis. A negative value under the "Model Performance" column indicates the amount by which the models under-predicted verified savings, while a positive value indicates the model over-predicted verified savings.

²⁶ The Cadmus Group LLC. May 22, 2018. *Focus on Energy Calendar Year 2017 Evaluation Report, Volume II*. <https://assets.focusonenergy.com/production/WI%20FOE%20CY%202017%20Volume%20II%20FINAL.pdf>

Table 5. 2017 Focus on Energy Whole Home Billing Analysis Results for Projects Modeled Using Snugg Pro

Income Level	Savings Type	Model Performance	Precision at 90% Confidence
Standard Income (>80 % statewide median income)	Electricity	-5%	±16%
	Natural Gas	+61%	±9%
Income-Qualified (<80% statewide median income)	Electricity	-53%	±28%
	Natural Gas	+37%	±15%
Overall	MMBtu	+54%	n/a

The U.S. DOE requires that states monitor the energy savings reliability of the models and tools used in delivering the HOMES program and to take corrective action if actual savings results are less than 70 percent of estimated savings. The State of Wisconsin plans to contract with Cadmus, the Focus third-party evaluator, to perform evaluation, measurement, and verification duties for Wisconsin’s HOMES program. Should the Commission approve a Modeled program path for Wisconsin’s HOMES program, the scope of these evaluation services will include a billing analysis to monitor the reliability of the models used.

Measured Program Path

Under the Measured program path, rebate amounts are based on the level of savings that are measured after project completion, with participants required to achieve a minimum of 15 percent savings in order for a rebate to be paid. Measured program path rebates can cover up to 80 percent of project costs for low- to moderate-income households (i.e., those households earning less than 150 percent AMI) while rebates can cover up to 50 percent of total project costs in higher income households (i.e., those earning more than 150 percent of AMI).

There are relatively few examples of energy efficiency programs implementing a measured program design, compared to the number of programs with experience implementing a modeled program design. Furthermore, according to the U.S. DOE, measured programs tend to

have higher administrative and overhead costs compared to model-based programs.²⁷ The U.S. DOE has indicated that states may want to consider their anticipated overall administrative costs relative to their maximum allocation when deciding which HOMES program path to implement.

Another program delivery consideration with the measured program path is the time delay between when a customer completes a project (and project costs are incurred) and the time until savings can be verified and a rebate payment can be approved. U.S. DOE Guidance requires the calculation of home- or portfolio-level savings be based on no less than nine months of customer usage data after the final installation in the home or portfolio, with 12 months of post-installation data preferred. Consequently, this program design requires some entity, whether the customer or a program implementer, to bear the risk of waiting for savings to be verified and a rebate to be paid. Inherent in this process is also the potential that the measured savings is less or more than was estimated and results in a lower or higher eligible rebate than anticipated. The delay in rebate payment combined with the uncertainty on the final measured savings level may also create challenges in managing the rebate budget, such as in reliably tracking ongoing spending and projecting budgetary needs.

The financial considerations described above would create an incentive for the program implementer to target measured savings projects at households with high likelihoods of achieving the program's savings thresholds. A state's ability to access customer usage data to identify potential participants and perform direct outreach and marketing to encourage participation is also an important consideration for states when deciding which HOMES pathway to implement. Unlike other statewide energy efficiency programs with third-party

²⁷ U.S. Department of Energy, State & Community Energy Programs. Home Efficiency Rebates Modeled and Measured Paths: Inflation Reduction Act Provision 50121. Webinar. <https://www.youtube.com/watch?v=l8f1-9MxjI>.

administration, utilities in Wisconsin do not presently share customer data with Focus.²⁸

Further considerations related to utility data access for Wisconsin's HER programming are discussed below.

Commission Considerations – Measured vs. Modeled Program Path

The U.S. DOE requires states to indicate in their application package which HOMES program delivery pathway they will implement. Program planning and outreach performed thus far has led the planning team to propose, in the attached draft application materials, implementing the Modeled program path. Past experience with a model-based program design and uncertainty related to the ability to efficiently and comprehensively access utility data to support the delivery of a measured savings program design have influenced this initial conclusion. Under Alternative One, the Commission could affirm this initial proposal and direct Wisconsin's HOMES program to use a modeled approach. The Commission may also wish to consider directing Wisconsin's HOMES program to use the Measured program path. This may be appropriate if the Commission prioritizes ensuring that rebates are paid based on verified savings rather than model estimates and is interested in using these federal funds to expand into a new program design approach for the state. Under Alternative Three, the Commission may wish to direct Wisconsin's HOMES programs to use both models.

²⁸ Regulators in both Oregon and Vermont, the two states whose statewide program structure are most closely comparable to Wisconsin, have ordered utilities to share comprehensive customer data with their third-party energy efficiency program administrators.

- Public Utility Commission of Oregon. Order of August 23, 2012 In the Matter of Data Transfer of Customer Information for Public Purposes. Order No. 12-323. <https://apps.puc.state.or.us/orders/2012ords/12-323.pdf>.
- State of Vermont Public Service Board. Order of June 23, 2000 under Docket 6379: Investigation into Dispute Regarding the Provision of Customer Information to Efficiency Vermont by the Village of Hyde Park Electric Department, the Morrisville Water and Light Department, the Barton Village Inc. Electric Department, and the Vermont Marble Power Division of OMYA, Inc. <https://puc.vermont.gov/sites/psbnew/files/orders/6379fnl.pdf>.

A decision to direct Focus to implement Measured pathway, either by itself or jointly with a Modeled pathway, is likely to delay the state's submittal of its application to the U.S. DOE to allow for additional time to establish the program criteria and guidelines necessary for the U.S. DOE's review and approval. It should also be noted that the decision made here does not preclude the state from requesting approval from the U.S. DOE to modify its program implementation pathway at a future point in time. While the planning team recommended the modeled pathway in the application due to the considerations described above, it has also communicated an interest in assessing opportunities for implementing the Measured path at a future date. However, given the accelerated timeline of the State's HOMES application, the planning team has not yet developed the program design details necessary for the U.S. DOE's review and approval for the Measured path.

Commission Alternatives: HOMES Modeled and/or Measured Program Delivery

Alternative One: The State of Wisconsin's application to the U.S. DOE for IRA Section 50121 (HOMES) shall confirm it will implement the Modeled program path.

Alternative Two: The State of Wisconsin's application to the U.S. DOE for IRA Section 50121 (HOMES) shall be modified to confirm it will implement the Measured program path.

Alternative Three: The State of Wisconsin's application to the U.S. DOE for IRA Section 50121 (HOMES) shall be modified to confirm it will implement both the Modeled program path and the Measured program path.

Alternative Four: Other action consistent with the Commission's discussion.

Alternative Five: Remand the matter back to staff for additional information consistent with the Commission's discussion.

HOMES Rebate Amounts and Program Targeting by Household Income

HOMES Program Rebate Amounts for Low-Income Households

IRA Section 50121 establishes the maximum rebate amounts for projects eligible under the HOMES program. The law establishes tiers of rebates based on the amount of energy saved and the household’s annual income. With the Modeled program path, upgrades performed in homes occupied by low-income households are eligible to receive higher rebate amounts for the same level of savings compared to homes occupied by households earning higher incomes. Tiered rebates based on household income are not a feature of the Measured program path, though if the Commission elects to implement the Measured program path in its decision in the preceding section, Wisconsin could also seek the U.S. DOE’s approval to allow for Measured program path rebates to cover a greater portion of total project costs for low-income households. Table 6 shows HOMES program rebate amounts by savings level and income tier.

Table 6. Section 50121 HOMES Program Rebates

Type of Home Energy Project	Households below 80% AMI (Low-Income Households)	Households between 80% and 150% AMI	Households above 150% AMI
Modeled Savings at least 20%	80% of project costs up to \$4,000	50% of project costs up to \$2,000 (maximum of \$200,000 for a multifamily building)	50% of project costs up to \$2,000 (maximum of \$200,000 for a multifamily building)
Modeled Savings at least 35%	80% of project costs up to \$8,000	50% of project costs up to \$4,000 (maximum of \$200,000 for a multifamily building)	50% of project costs up to \$4,000 (maximum of \$200,000 for a multifamily building)
Measured Savings at least 15%	Per kilowatt-hour-equivalent savings up to 80% of project costs	Per kilowatt-hour-equivalent savings up to 80% of project costs	Per kilowatt-hour-equivalent savings up to 50% of project costs

The U.S. DOE also allows states to request authority to provide larger rebates, up to 100 percent of project costs, for low-income households participating in the HOMES program. The

U.S. DOE is recommending states increase HOMES rebate caps for low-income households (i.e., those earning below 80 percent).²⁹

A decision to increase rebate amounts for low-income households may impact the overall number of households served. As rebate spending per household increases, the total number of households that can be served with available funding will decrease. However, higher rebate amounts may be necessary to attract certain low-income households into the program that could not otherwise afford the out-of-pocket project costs needed to participate.

This topic was explored during planning and stakeholder engagement for the HER programs. Online survey results and feedback received at the in-person and virtual sessions indicated mixed opinions from stakeholders. APTIM's stakeholder engagement summary report notes overall different relative preferences between those providing input at in-person events and in the online survey. Respondents to the online survey were more likely to favor setting rebates at levels lower than the U.S. DOE maximum amounts to allow the program to extend its reach to more households, while attendees at in-person events were more likely to favor setting rebate amounts in a manner that would prioritize making larger impacts for low-income households.

It should also be noted that a state's ability to access its full allocation of program funds is dependent upon its ability to effectively deliver program funds to low-income households. The U.S. DOE has established four funding tranches for the HER programs with each tranche representing between 20 and 30 percent of a state's overall funding allocation. Access to each funding tranche requires states to submit a continuation application for the U.S. DOE's review and approval. These applications must demonstrate that the state has achieved certain

²⁹ U.S. Department of Energy, State & Community Energy Programs. *Serving Low-Income Households with Home Energy Rebates*. <https://www.energy.gov/scep/slsc/home-energy-rebate-program/serving-low-income-households-home-energy-rebates>.

deliverables or milestones and that they are expending program funds toward their minimum low-income and low-income multifamily targets.³⁰ Setting higher HOMES program rebate amounts for low-income households may increase participation for low-income households and enhance Wisconsin's ability to access funding tranches more quickly. A discussion of the State's consideration in setting low-income budget targets beyond the U.S. DOE's minimum targets is presented further below in this memorandum.

Commission Alternatives – HOMES Rebates Amounts for Low-Income Households

Alternative One below is appropriate if the Commission wishes to maintain the rebate amounts for low-income households as shown in Table 6. These are the rebate amounts established in the IRA. Alternative Two is appropriate if the Commission wishes to set higher HOMES rebate amounts for low-income households (those earning less than 80 percent AMI), as encouraged by the U.S. DOE, and directs staff to seek the U.S. DOE's approval in Wisconsin's HOMES application. Sub-alternatives related to the terms of the increase are provided in sub-alternatives, with different sub-alternatives depending on whether the Commission has selected for HOMES the Modeled path, the Measured path, or both. The rebate structure presented in Sub-Alternative A was discussed among APTIM and Commission staff during program planning. The rebate amounts in Sub-Alternative A would increase the HOMES Modeled program path rebates for low-income households by 25 percent compared to amounts outlined in the IRA. The rebate structure presented in Sub-Alternative B would increase the HOMES Measured program path rebate cap for low-income customers from 80 percent to 100 percent of project costs. The Commission may consider selecting both alternatives if it has decided to implement both program paths.

³⁰ Additional detail on program funding tranches and low-income spending targets required for states to receive their full funding allocation is provided below.

Alternative One: The State of Wisconsin shall not request authorization to increase the rebate cap for low-income households in its IRA Section 50121 HOMES application to the U.S. DOE.

Alternative Two: The State of Wisconsin shall request authorization to increase the rebate cap for low-income households in its IRA Section 50121 HOMES application to the U.S. DOE.

Sub-Alternative A: The State of Wisconsin shall propose increasing the rebate cap for low-income households to 100 percent of project costs up to \$5,000 for projects with modeled savings of at least 20 percent and 100 percent of project costs up to \$10,000 for projects with modeled savings of at least 35 percent for a Modeled program path.

Sub-Alternative B: The State of Wisconsin shall propose increasing the rebate cap for low-income households to a per kilowatt-hour-equivalent savings up to 100 percent of project costs for a Measured program path.

Sub-Alternative C: The State of Wisconsin shall propose increasing the rebate cap for low-income households in a manner consistent with the Commission's discussion.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

HOMES Program Rebate Amounts for Households Earning more than 150 Percent of AMI

The U.S. DOE has clarified that states have the flexibility to set lower rebate amounts for HOMES based on its program priorities. Continuing from the discussion above, one way the Commission could consider exercising this flexibility is to establish lower rebate levels for households those earning greater than 150 percent of AMI. An analysis of the U.S. Census

Bureau's 2022 American Community Survey³¹ shows that approximately 25 to 30 percent of Wisconsin households earn more than 150 percent of AMI.

Establishing lower HOMES rebate amounts for those households may be appropriate if the Commission finds it to be a more equitable program design to require higher-income households to co-fund a greater portion of project costs compared to moderate-income households. Establishing lower HOMES rebates for those households earning more than 150 percent AMI may help to extend the reach of the HOMES rebate budget and allow Wisconsin's HOMES program to serve more households overall. On the other hand, the Commission may find that adding additional rebate amounts by household income to the HOMES program design adds complexity that may lead to confusion among program participants, contractors, and other stakeholders.

As mentioned above, stakeholder feedback collected from APTIM's online survey and gathered at in-person engagement sessions indicated mixed opinions on how to structure IRA HER program rebates in Wisconsin. Overall, responses were nearly evenly split with respect to preference for offering rebate amounts designed to serve as many households as possible versus a design that prioritizes households with lower income and higher energy burden.

Commission Alternatives – HOMES Rebates Amounts for Households Earning more than 150 Percent AMI

Alternative One below is appropriate if the Commission wishes to maintain the rebate amounts for households earning more than 150 percent of AMI as shown in Table 6. These are the rebate amounts established in the IRA for households earning more than 80 percent of AMI.

³¹ U.S. Census Bureau. American Community Survey, 2022: ACS 5-Year Estimates Data Profiles. DP03, Selected Economic Characteristics. Accessed February 28, 2024 from: <https://data.census.gov/table/ACSDP5Y2022.DP03?g=040XX00US55&tid=ACSDP5Y2022.DP03>.

Alternative Two is appropriate if the Commission wishes to set lower HOMES rebate amounts for households earning more than 150 percent of AMI. The rebate structure presented in Sub-Alternative A was discussed among APTIM and Commission staff during program planning. The rebate amounts in Sub-Alternative A would decrease the HOMES rebates for households earning more than 150 percent AMI by 25 percent compared to the maximum amounts outlined in the IRA.

Alternative One: The State of Wisconsin shall not establish rebate amounts that are lower than the IRA maximum for households earning more than 150 percent AMI in its IRA Section 50121 HOMES application to the U.S. DOE.

Alternative Two: The State of Wisconsin shall establish rebate amounts that are lower than the IRA maximum for households earning more than 150 percent AMI in its IRA Section 50121 HOMES application to the U.S. DOE.

Sub-Alternative A: The State of Wisconsin shall decrease the rebate amount for households earning more than 150 percent AMI to 50 percent of project costs up to \$1,500 for projects with modeled savings of at least 20 percent and 50 percent of project costs up to \$3,000 for projects with modeled savings of at least 35 percent.

Sub-Alternative B: The State of Wisconsin shall propose rebate amounts for households earning more than 150 percent AMI consistent with the Commission's discussion.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

HOMES Program Targeting Low-to Moderate-Income Households

States have discretion to narrow participant eligibility in the HER programs based on the state's individual priorities. In its Frequently Asked Questions (FAQ), the U.S. DOE explains,

“within the scope of the program requirements, states may choose to restrict program eligibility to a narrower set of households, existing conditions, and/or technologies than is allowable under the law.”³² However, as mentioned earlier, the U.S. DOE has also clarified that states cannot fully exclude eligibility in the HOMES program to households based on their income. While a state may prioritize the delivery of HOMES rebate funding for low- and moderate-income households, the program must be available to households of all income levels, including high-income households, at some point during the program’s life.³³

APTIM has discussed a proposal with Commission staff to limit HOMES eligibility during the first phase of the program to only those households earning less than 150 percent of AMI. The first phase of the HOMES program refers to the period of time between when Wisconsin receives Tranche #1 of funding up until Tranche #3 of funding is awarded by U.S. DOE.

Table 7 is adapted from the U.S. DOE Guidance to show how the U.S. DOE will release states’ full funding allocations for the HER programs. A state’s first tranche of funding is released upon the U.S. DOE’s approval of its grant application. The second tranche is released upon the U.S. DOE’s approval of a state’s implementation blueprints with authorization to launch the program. Subsequent tranches will be released as the U.S. DOE approves required deliverables or achieves certain milestones.

³² Department of Energy. Office of State and Community Energy Programs. *Home Energy Rebates Frequently Asked Questions*. FAQ #65. [Home Energy Rebates Frequently Asked Questions | Department of Energy](#)

³³ *Ibid.* FAQ #83.

Table 7. HER Program Funding Tranches

Tranche #	Portion of Awarded Grant Funds Released	Required Deliverable(s) or Milestone(s)	LI Target*	LI Minimum†	LI MF Target*	LI MF Minimum†
1	25% funds	Negotiated and approved state grant application				
2	30% funds (55% total)	Approved Program Launch Approved State Implementation Blueprint	10-15%	5%		
3	25% funds (80% total)	Approved Market Transformation Plan	50-60%	35%	25%	5%
4	20% funds (100% total)	Approved independent privacy and security review Approved review of QA Plan Completed review of incentive implementation	80%	60%	70%	25%

*Targets indicate U.S. DOE’s expected performance towards expending low-income (LI) and low-income multifamily (LI MF) allocations. Applicants should strive to achieve targets.

† Minimums must be met to receive next tranche of funds.

Following the Commission’s decisions in this memorandum, the State of Wisconsin intends to submit its HOMES grant application and Implementation Blueprints to the U.S. DOE for approval. Upon approval, the U.S. DOE would award both Tranche #1 and Tranche #2 of funding, representing 55 percent of Wisconsin’s total HOMES allocation.³⁴

A decision to limit HOMES eligibility to households earning less than 150 percent AMI during the first phase of HOMES may be appropriate if the State wants to prioritize distributing HOMES rebate funds to low-to-moderate income households early in the program’s life. This approach may also support Wisconsin in achieving its minimum spending target for low-income households required to access the third tranche of program funding. An analysis of the U.S.

³⁴ Wisconsin’s total allocation from Tranche #1 and Tranche #2 of HOMES is \$41,197,657, including funds already awarded by the U.S. DOE as part of Wisconsin’s Early Administrative Funds.

Census Bureau's 2022 American Community Survey³⁵ shows that approximately 70 to 75 percent of Wisconsin households earn less than 150 percent of AMI.

It may be reasonable to assume that higher income households are better positioned to afford upgrades without a rebate, to take advantage of available tax credits³⁶, and have access to credit compared to low-to-moderate income households. Therefore, these households may be less likely to delay home efficiency projects compared to low- and moderate-income households if HOMES rebates are not available to them during the program's first phase.

Limiting HOMES eligibility to households earning less than 150 percent AMI during the program's first phase may have certain administrative advantages as well. With this approach, both HOMES and HEAR would launch with the same income eligibility requirements (i.e., both programs would be available exclusively to households earning less than 150 percent AMI). This alignment could simplify program outreach and education during this first phase of programming. Conversely, limiting HOMES to low- and moderate-income households during the first phase of the program and opening eligibility to all households, regardless of income, later in the program's life may lead to confusion in the marketplace and/or customer satisfaction issues.

Finally, staff note that this program design is not currently written into the draft application narrative for HOMES, though it has been discussed conceptually with the U.S. DOE. A program design to limit HOMES eligibility to households earning less than 150 percent of AMI during the program's first phase would be specified in Wisconsin's HOMES application materials prior to submission should the Commission decide it is appropriate.

³⁵ U.S. Census Bureau. American Community Survey, 2022: ACS 5-Year Estimates Data Profiles. DP03, Selected Economic Characteristics. Accessed February 28, 2024 from: <https://data.census.gov/table/ACSDP5Y2022.DP03?g=040XX00US55&tid=ACSDP5Y2022.DP03>.

³⁶ <https://www.irs.gov/credits-deductions/energy-efficient-home-improvement-credit>.

Commission Alternatives – HOMES Program Income Eligibility

Alternative One: The State of Wisconsin shall limit eligibility in its IRA Section 50121 HOMES program to low-to-moderate income households; those earning less than 150 percent of Area Median Income, during the first phase of the program.

Alternative Two: Take no action.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

HOMES and HEAR Low-Income Household Rebate Budget Targets

The U.S. DOE requires states to reserve a minimum proportion of rebate funds to serve low-income single-family and multifamily households based on each state's percentage of low-income households earning less than 80 percent of AMI to ensure direct benefits to low-income households in proportion to their representation in the state. Accordingly, Wisconsin is required to reserve 39.3 percent of its rebate funding for HOMES and HEAR for low-income households. In addition, states are required to reserve an additional 10 percent of HOMES and HEAR rebate funding specifically for low-income multifamily households. The aforementioned amounts are additive, resulting in the requirement that a minimum of 49.3 percent of Wisconsin's overall rebate funding be reserved for low-income single-family and multifamily households.

Table 8 below shows Wisconsin's minimum rebate allocations for low-income households as determined by the U.S. DOE. Percentages shown in parentheses represent the portion of Wisconsin's minimum rebate funding (i.e., total allocation less the maximum allowable administrative budget) that must be reserved to serve low-income households (i.e., either single family or multifamily households) and, specifically, low-income multifamily households.

Table 8. Wisconsin’s Minimum Allocations of Rebate Funding for Low-Income Households

Category	HOMES	HEAR
Minimum Rebate Funding – All Households ¹	\$59,923,864	\$59,575,160
Minimum Rebate Allocation for Low-Income Households	\$23,552,694 (39.3%)	\$23,416,031 (39.3%)
Minimum Rebate Allocation for Low-Income Multifamily Households	\$5,992,386 (10%)	\$5,957,616 (10%)
Total Minimum Rebate Allocation for Low-Income Households	\$29,545,080	\$29,373,647
Total % of Rebate Funding Reserved for Low-Income Households	49.3%	49.3%

Funding figures can be found in Appendix A of the U.S. DOE Guidance.

¹ Minimum Rebate Funding Allocation reflects total State allocation less maximum 20% for program administration.

States may consider setting more aggressive low-income household rebate allocation targets for their HER programs and the U.S. DOE is encouraging states to go beyond these minimum allocations.³⁷ A decision to allocate rebate funds above the U.S. DOE’s minimum requirements may be appropriate if states wish to use the HER programs to address historic inequities in delivering utility-funded programs. Reserving additional funds to serve low-income households may also be appropriate if states also wish to request authorization from the U.S. DOE to make program modifications to increase rebate amounts or caps for low-income households to support opportunities for deeper energy saving retrofits.

Commission Alternatives – HOMES Low-Income Budget Allocation Targets

The decision alternatives below present the Commission with options for setting budget allocation targets for serving low-income households for HOMES. Alternative One represents an option to set the low-income budget target equal to the U.S. DOE’s minimum requirements as established in Appendix A of the U.S. DOE Guidance. Alternative Two and its sub-alternatives afford the Commission the option to establish rebate budget allocation targets for low-income

³⁷ U.S. Department of Energy, State & Community Energy Programs. Serving Low-Income Households with Home Energy Rebates. <https://www.energy.gov/scep/slsc/home-energy-rebate-program/serving-low-income-households-home-energy-rebates>.

households that are above and beyond the U.S. DOE's minimum requirements presented in Table 8 above (i.e., 49.3 percent of total rebate funding allocation for each program). In making its decision, the Commission may wish to take into account its decisions in the preceding sections regarding the option to increase the cap on rebate amounts for low-income households participating in the HOMES program.

With an upward adjustment, the additional rebate funding above the U.S. DOE minimum amounts could be spent on projects serving either low-income single family or low-income multifamily households. Because market demand remains uncertain for a project yet to be launched, Commission staff and APTIM believe it may be advantageous to maintain flexibility to deploy any additional rebate funds reserved for low-income households that are beyond the U.S. DOE minimum amounts to either low-income single family or low-income multifamily households, rather than setting specific budget targets for each segment that may require adjustment after the programs enter the market and relative customer demand is better understood. Further adjustments could be explored with the Commission and U.S. DOE in the future.

Finally, the U.S. DOE has provided staff with clarification that the HOMES program cannot be limited to low-income households and the state must make rebates available to all eligible residents at some point during the life of the program. Therefore, Wisconsin's HOMES program cannot reserve all available rebate funds for low-income households. At least some amount of rebate funding must be available for moderate- and high-income households during the life of the program. By contrast, the HEAR program is limited to serving only those households earning less than 150 percent AMI. Wisconsin's HEAR program cannot reserve any rebate funds strictly for those households earning more than 150 percent AMI.

With this clarification in mind, staff present the Commission with the option to reserve up to 70 percent of HOMES rebate funding for low-income households. In planning sessions with APTIM, it has been discussed that a decision to reserve more than this amount may introduce administrative challenges for the program. For example, should there be high demand for HOMES rebates from households earning more than 80 percent AMI, it may be challenging to manage toward that demand when funds available for those households are limited to levels that are not adequate to meet need. The decision alternatives below pertaining to the HOMES program have a direct connection to the decision alternatives in the preceding section. The amount of HOMES rebate funding allocated to low-income households also determines the rebate funding that could be spent on projects serving moderate- and high-income households (those households earning more than 80 percent AMI). A decision to limit eligibility to low- to moderate-income households during the first phase of HOMES and to reserve a significant portion of rebate funding for low-income households is likely to result in fewer high-income households being served overall compared to a situation where program eligibility is open to all households from the outset and less rebate funding is reserved for low-income households. On the other hand, this combination of decisions is likely to result in the program serving more low-income households overall compared to a decision to open program eligibility to all income levels from the outset and reserve the rebate funding for low-income households consistent with the U.S. DOE's minimum requirements.

Commission Alternatives: HOMES Program Low-Income Budget Allocation

Alternative One: The State of Wisconsin shall reserve 49.3 percent of IRA Section 50121 HOMES program rebate funding for low-income households consistent with the U.S. DOE's minimum requirements as presented in Appendix A of the U.S. DOE Guidance.

Alternative Two: The State of Wisconsin shall reserve a greater proportion of IRA Section 50121 HOMES program rebate funding for low-income households than U.S. DOE's minimum requirements.

Sub-Alternative A: The State of Wisconsin shall reserve 60 percent of IRA Section 50121 HOMES program rebate funding for low-income households.

Sub-Alternative B: The State of Wisconsin shall reserve 70 percent of IRA Section 50121 HOMES program rebate funding for low-income households.

Sub-Alternative C: The State of Wisconsin shall reserve a portion of IRA Section 50121 HOMES program rebate funding for low-income households consistent with its discussion.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

Commission Alternatives -- HEAR Program Low-Income Budget Allocation

As mentioned above, the IRA restricts the HEAR program's funding to only those households earning less than 150 percent AMI. The decision alternatives below seek the Commission's direction in setting the proportion of the HEAR rebate budget allocated specifically to low-income households (those earning less than 80 percent AMI). Alternative One represents a decision to allocate HEAR rebate funding equal to the U.S. DOE's required minimum amount for low-income single family and multifamily households as presented in Table 8 above. Alternative Two provides the Commission with options to reserve a greater portion of the HEAR program rebate funding for low-income households than is required by the U.S. DOE. In contrast to HOMES, the planning team is not aware of specific guidance provided by U.S. DOE to indicate that states must make rebates eligible to all eligible customers during

the life of the program. For that reason, the sub-alternatives within Alternative Two include an option for the Commission to reserve 100 percent of HEAR funding for low-income households.

Alternative One: The State of Wisconsin shall reserve 49.3 percent of HEAR program rebate funding for low-income households consistent with the U.S. DOE's minimum requirements as presented in Appendix A of the U.S. DOE Guidance.

Alternative Two: The State of Wisconsin shall reserve HEAR program rebate funding for low-income households that are greater than U.S. DOE's minimum requirements as presented in Appendix A of the U.S. DOE Guidance.

Sub-Alternative A: The State of Wisconsin shall reserve 60 percent of HEAR program rebate funding for low-income households.

Sub-Alternative B: The State of Wisconsin shall reserve 70 percent of HEAR program rebate funding for low-income households.

Sub-Alternative C: The State of Wisconsin shall reserve 100 percent of HEAR program rebate funding for low-income households.

Sub-Alternative D: The State of Wisconsin shall reserve a portion of HEAR program rebate funding for low-income households consistent with its discussion.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

HOMES Retroactive Rebates Approach

IRA permits the award of retroactive HOMES program rebates for projects begun on or after Aug. 16, 2022, that also meet other HOMES program requirements. By contrast, IRA does not permit retroactive rebates under the HEAR program.

Section 3.1.2 of the U.S. DOE Guidance, says that states must provide HOMES rebates for projects that:

- are initiated on or after Aug. 16, 2022,
- meet all U.S. DOE requirements and
- meet any additional state requirements.

U.S. DOE has three checklists for states related to retroactivity to document its requirements, which are outlined in “*Retroactivity Fact Sheets and Eligibility Checklists.*”³⁸ The three checklists include: one for states using a modeled approach, one for states using a measured approach, and a general consumer checklist. Overall, the checklists provide suggested language for states to use on various issues related to retroactive project eligibility and cover such elements as: timing of the energy upgrades or retrofits (began on or after Aug. 16, 2022); the need for a home assessment that includes a summary of equipment and/or materials; projected energy savings; an estimate of the energy impact of the installed equipment; an invoice detailing installed equipment and total costs; and what equipment is eligible for a rebate.

The draft application incorporates all nine items on the *Retroactivity for Consumers Checklist*. However, if the Commission determines that HOMES will use the modeled approach once the program begins, the fourth checkbox will require retroactive assessments to show energy savings of at least 20 percent (rather than 15 percent) to be eligible for rebates.

Additional Proposed State Requirements

In addition to U.S. DOE *Retroactivity for Consumers Checklist* summarized above, the draft application includes two additional requirements which address: 1) eligibility or income qualification, and 2) require that applications for retroactive rebates need to be submitted by December 31, 2025.

³⁸ [Home Efficiency Rebates \(50121\) Retroactivity Fact Sheet and Eligibility Checklists \(energy.gov\)](https://www.energy.gov/home-energy-rebates/50121-retroactivity-fact-sheet-and-eligibility-checklists)

The HOMES Narrative, Question 31, asks states to identify whether they are requesting authorization from DOE to use a time period outside of a one-year period for categorical eligibility. Wisconsin’s draft application proposes to allow eligibility to be determined using documentation dated within the preceding 24 months of the project being completed in order to accommodate instances where previous year documentation is not available. The planning team proposed this adjustment to recognize that some low-income programs do not update their enrollment information annually; and some households (given relocations or other factors) may not have up-to-date enrollment documentation. Therefore, the State proposes to accept documentation that demonstrates a household’s enrollment within this longer period of time of 24 months.

Secondly, Wisconsin’s draft application proposes to specify a deadline of December 31, 2025 for customers to submit a retroactive rebate application. This deadline is intended provide clarity to potential customers, strike a balance between allowing time for customers to pursue retroactive rebates and ensuring retroactive rebates are processed in a reasonably timely manner, and allow the Program Administrator to more accurately track and project program expenses budgets during the later years of the program.

Commission Alternatives: HOMES Retroactive Rebates Approach

The Commission may consider whether to adopt one or both of the proposed “additional state requirements” proposed by Commission staff and APTIM. The Commission may also consider whether modifications to the proposed requirements or any additional requirements may be appropriate. In making this determination, the Commission may wish to take into account the appropriate balance between rewarding customers for proactively installing measures on or after August 16, 2022, while ensuring that the funds are appropriately distributed to the customers

targeted in the legislation and maintaining consistent requirements for projects performed prior to program launch and those waiting until after the program officially launches.

Under Alternative One, the Commission could adopt the proposed requirements as written. Under Alternative Two, the Commission may wish to select specific requirements based on its priorities for the program, modify the wording of proposed requirements, or add further requirements it believes to be appropriate. Remanding the matter back to Commission staff under Alternative Three may be appropriate if the Commission requires additional information to make its decision.

Alternative One: The State of Wisconsin shall include the additional proposed state requirements listed in the draft application.

Alternative Two: The State of Wisconsin shall include the additional proposed state requirements listed in the draft application, with modifications pursuant to the Commission's discussion.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

Disadvantaged Community Definition

The IRA HER programs must align with the principles of the Justice40 initiative, established by President Biden's Executive Order 14008, to ensure that at least 40 percent of the overall benefits of the programs' investments flow to DACs. The federal government has developed the CEJST to identify communities by census tract that are economically disadvantaged and overburdened by pollution and underinvestment in housing, transportation, water and wastewater infrastructure, and healthcare.³⁹ Each state's Community Benefits Plans

³⁹ <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>

(CBPs) for the HER programs must describe the benefits its programs will deliver to DACs, the actions the state will take to ensure benefits flow to DACs, and the methods it will use to assess and verify it is meeting the requirements of the Justice40 initiative.

A state may, with U.S. DOE approval, establish its own definition of DACs for purposes of implementing the HER programs. A state may want to pursue its own DAC definition if there are areas of the state that are not within DACs as identified by CEJST that it wishes to ensure are prioritized for receiving an equitable share of program benefits. States using their own DAC definition must ensure that definition and methods for screening for households that qualify as located in DACs meet certain minimum requirements outlined in the U.S. DOE Guidance.⁴⁰ States that do not wish to adopt an alternative DAC definition will use the U.S. DOE default definition.

Alternative One may be appropriate if the Commission wishes to maintain consistency with the DAC definition used for other SEO grant opportunities that also address energy efficiency offerings in Wisconsin, including the Rural Energy Startup Program ([PSC REF#: 485930](#)). Alternative Two may be appropriate if the Commission is aware of additional areas of the state that do not fit within the U.S. DOE's definition for a DAC and sees the HER programs as an opportunity to expand Wisconsin's DAC definition to include those areas. Staff note that a decision to adopt a Wisconsin-specific DAC definition may delay Wisconsin's HER program applications to the U.S. DOE as it would require the program team to perform additional analysis to ensure it conforms with certain federal requirements established in the U.S. Office of Management and Budget Memorandum M-21-28.⁴¹

⁴⁰ See Section 3.1.4 of the U.S. DOE Guidance for a state's requirements for using its own DAC definition.

⁴¹ See [M-21-28 \(whitehouse.gov\)](#).

Commission Alternatives – DAC Definition

Alternative One: The State of Wisconsin’s Home Energy Rebate programs shall use the U.S. DOE definition of a disadvantaged community.

Alternative Two: The State of Wisconsin’s Home Energy Rebate program applications shall seek the U.S. DOE’s approval of an alternative definition for a disadvantaged community consistent with the Commission’s discussion.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission’s discussion.

Utility Data Access

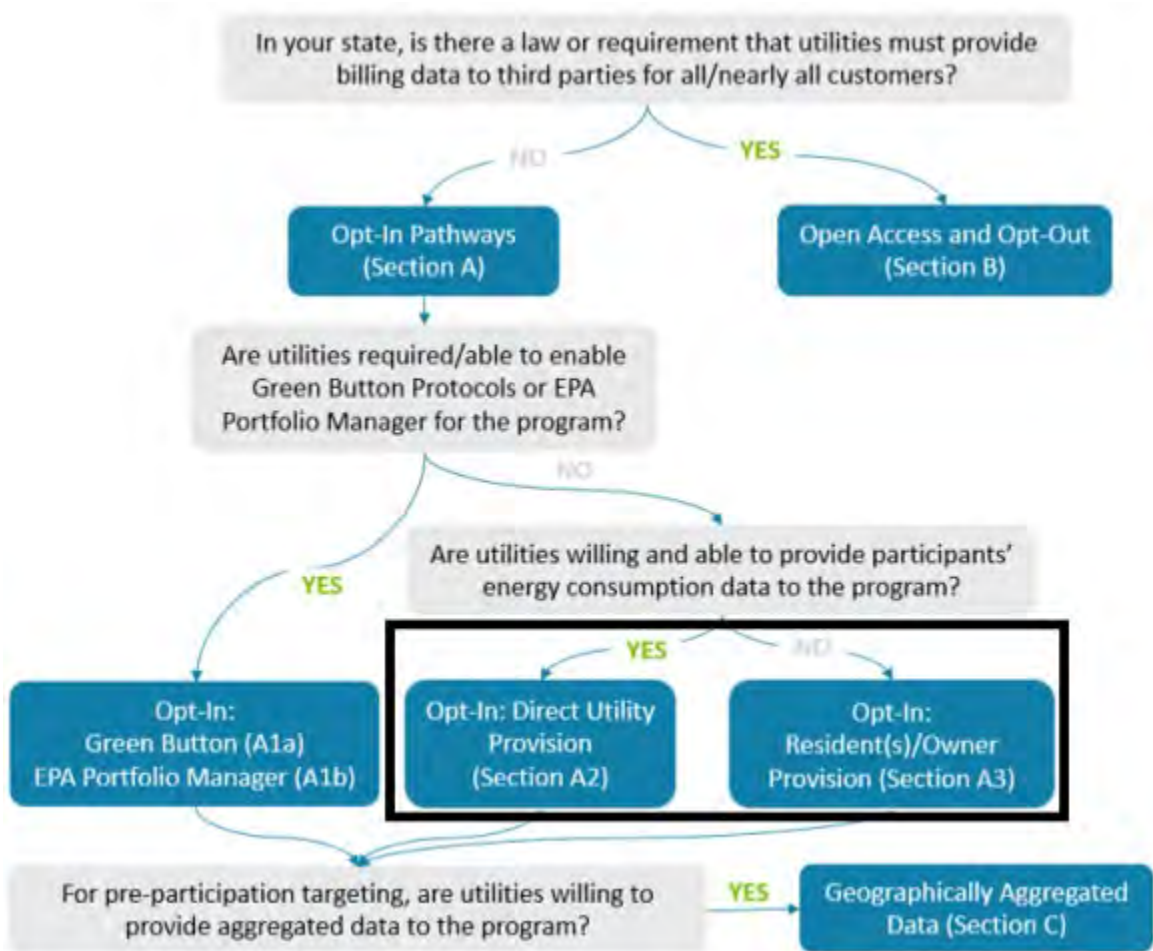
The U.S. DOE requires States implementing the HOMES program develop a comprehensive Utility Data Access Plan to address program requirements related to customer energy consumption and billing data. Households wishing to participate in the HOMES program, regardless of whether the state pursues the Modeled or Measured path, will be required to provide the program access to 12 months pre-project energy consumption and billing data to support home assessment model calibration and 12 months of post-project energy consumption and billing data for purposes of post-project evaluation. A Utility Data Access Plan is not a required implementation blueprint for states applying for the HEAR program. However, staff anticipate a need to access utility data for purposes of evaluating the impacts of HEAR. Staff intend to analyze participant billing data at least once during the HEAR program life to understand its impacts on participants’ energy consumption and utility bills.

Wisconsin’s draft plan proposes to require customers participating in both HOMES and HEAR provide their authorization allowing the program to access their energy consumption and billing data. Requesting customer consent for the program to access their energy consumption

and billing data is consistent with the U.S. DOE's guidance for utility data access.⁴² Figure 2 below was developed by U.S. DOE to assist states in determining an appropriate pathway for utility data access based on existing laws and utility capabilities. Wisconsin's draft plan would rely on a combination of the Opt-In: Direct Utility Provision (Section A2 in Figure 2) and the Opt-In: Resident(s)/Owner Provision (Section A3 in Figure 2) utility data access pathways. Additional detail on these pathways is provided below. However, Wisconsin's method of accessing customer energy consumption and billing data would need to comply with Wisconsin statutes and administrative code provisions addressing sharing and confidentiality of customer information, which are further discussed below

⁴² U.S. Department of Energy. Office of State and Community Energy Programs. July 24, 2023. *IRA 50121 Home Efficiency Rebates Data Access Guidelines*. <https://www.energy.gov/scep/articles/ira-50121-home-efficiency-rebates-data-access-guidelines>.

Figure 2. Utility Data Access Pathways: U.S. DOE Guidance to States⁴³



The draft plan envisions the Wisconsin HER programs will access energy consumption and billing data in one of two ways: 1) the customer retrieves the data themselves using their utility’s Customer Relationship Management (CRM) system and provides the data to the program, either themselves or with the assistance of a contractor, via secure online portal or, 2) the customer authorizes the program to access their energy consumption and billing data on their behalf by providing their consent during the program application phase.

⁴³ U.S. DOE State & Community Energy Programs. January 2024. *IRA Section 50121 Home Efficiency Rebates: Data Access Pathways Background and Plan Templates*. https://www.energy.gov/sites/default/files/2024-01/Data%20Access%20Plan%20Template%20_final.docx.

With the second option, there are two potential methods for the program to access the customer's energy consumption and billing data: 1) the program will make a request to the utility directly and the utility would provide the customer's data to the program or 2) a program vendor would access the data directly on the customer's behalf using an existing web service originally created to support the Wisconsin Home Energy Plus Program. This existing web service connects to data systems at Wisconsin's largest (Class A) investor-owned utilities (IOU) along with some municipal utilities, allowing an approved vendor to access customer data in real-time. It should be noted that this web service connection to utility data is not available for all Wisconsin utilities. For households that are customers of utilities where this direct connection to energy consumption and billing data does not exist, the customer will authorize an approved vendor to request their energy consumption and billing data from the utility on their behalf or the customer would retrieve and submit the data themselves.

In addition to collecting data for individual customers seeking to participating in the IRA HER programs, access to comprehensive energy consumption and billing data datasets, prior to program participation, may be advantageous for purposes of program targeting and outreach. The U.S. DOE recommends that states considering pre-participation targeting and outreach coordinate with utilities to obtain geographically aggregated customer data. Geographically aggregated data anonymizes the customers in a manner that protects personally identifiable information (PII) for individual households. Third-parties with access to the geographically aggregated data analyze it in conjunction with other data (e.g., demographics) to tailor recommendations to customers located in target areas.

Neither the Commission nor the U.S. DOE currently have access to geographically aggregated utility meter level consumption data. Consequently, Wisconsin's draft plan does not

include plans or a strategy to perform pre-participation targeting using these data. However, as mentioned above, pre-participation targeting may be an advantage in implementing the Measured program path of HOMES. It may also help the program to refine its marketing and outreach strategy for a Modeled program path.

Utility Customer Data Access

Wisconsin law prohibits utilities from sharing customer data without the customer's consent. While Wisconsin Admin. Code § PSC 113.0505 applies broadly to all utilities, Investor-Owned Utilities (IOUs) and municipal utilities, Wisconsin Stat. § 196.137 establishes rules regarding sharing of *municipal* utility customer information. (Emphasis added.) Wis. Admin. Code § PSC 113.0505 provides that “[a]ny information received from individual customers which serves to identify them individually, by usage or status, shall not be released by a utility to any source...without the customer's consent.” Under Wis. Stat. §196.137(2), a municipal utility may not release customer information to any person without the customer's consent obtained on a form specified by the Commission. Customer information is defined as “any information received from customers which serves to identify customers individually by usage or account status.” Wis. Stat. § 196.137(1).

Each law has a potential path for utilities to share data pursuant to Commission action. The Commission has the authority to grant a waiver of the confidentiality requirement of Wis. Admin. Code § PSC 113.0505(2) due to unique, exceptional, or unusual situations. Wisconsin Admin. Code § PSC 113.01(2) provides:

Nothing in this chapter of the Wisconsin Administrative Code shall preclude special and individual consideration being given to exceptional or unusual situations and upon due investigation of the facts and circumstances therein involved, the adoption of requirements as to individual utilities or services which shall be lesser, greater, other, or different than those provided in said rules.

In a June 2009 Order⁴⁴, the Commission waived the confidentiality requirement of Wis. Admin. Code § PSC 113.0505(2) for utilities to share customer data with the Focus on Energy program. The Commission found that the confidentiality requirement was a barrier to achieving energy savings goals, efficient operations, and equitable service to utility customers because electric utilities would not release customer information to Focus on Energy. Therefore, the Commission found that an exceptional situation existed pursuant to Wis. Admin. Code. § PSC 113.01(2) and ordered Wisconsin electric utilities to release customer-specific information to Focus on Energy. The Commission conditioned its order on Focus on Energy entering into an agreement with the releasing utility specifying that Focus on Energy would protect the confidentiality of the information and use it solely to deliver its program, how long Focus on Energy would retain the information, and when Focus on Energy would return or destroy the information.

The Commission also has the authority to expressly authorize access to municipal customer data. Wisconsin Stat. § 196.137(2)(c) provides an exception for sharing of municipal customer data to the Commission, or any person whom the Commission authorizes by order or rule.

As stated above, the U.S. DOE requires States implementing the HOMES program to develop a comprehensive Utility Data Access Plan to address program requirements related to customer energy consumption and billing data. Additionally, access to customer data for the HEAR program is needed for purposes of evaluating the impacts of the HEAR program. The Focus Program Administrator and the Focus Evaluator will each contract directly with the Commission to plan and deliver the IRA HER programs. These entities, and their sub-contractor partners, are the parties that may need to access utility customer information.

⁴⁴ Final Decision, *Provision of Energy Utility Customer Information to Focus on Energy*, docket 9501-GF-101, 2009 WL 1709068 (Wis. PSC June 12, 2009.)

Similar to what the Commission has found with the Focus on Energy Program, access to comprehensive aggregated customer datasets from all electric and natural gas utilities (IOUs and municipal), which is currently not readily available, may help the program identify and target customers who would benefit from program rebates and help those customers overcome barriers to participation. In light of the U.S. DOE requirements and the unprecedented opportunities presented by IRA HER programs, the Commission may find that an exceptional circumstance exists and may choose to both grant a waiver under Wis. Admin. Code § PSC 113.01(2) and expressly authorize access to municipal customer data under Wis. Stat. § 196.137. While aggregated data may be able to be provided in a format that protects personally identifiable information and therefore does not conflict with statute and code, a waiver could provide upfront clarity to all parties and help facilitate a streamlined process for requesting and receiving customer billing data for utility customers. The Commission's waiver could also specify the parties authorized to receive customer information to provide further clarity and support for efficient program delivery to customers.

The Commission may also want to condition the receipt of customer data from the utilities on the parties receiving the data entering into data sharing agreements with the utilities. These arrangements could specify a utility's commitment to fulfill requests for customer billing data in a timely manner and establish processes and procedures related to topics such as cybersecurity, customer confidentiality protections, data retention guidelines, and other items as appropriate. Data sharing agreements, web services, and clear data exchange protocols could help to improve the efficiency of the delivery of the HER programs and facilitate prompt evaluation of program performance. Such arrangements may also be beneficial in exploring whether there are feasible and cost-effective options to pursue pre-participation targeting.

Commission Alternatives – Customer Utility Data Access

Alternative One: Grant a waiver of Wis. Admin. Code § PSC 113.0505(2) and find that an exceptional circumstance exists pursuant to Wis. Admin. Code. § PSC 113.01(2) for sharing of utility customer data and expressly authorize access to municipal customer data pursuant to Wis. Stat. § 196.137(2)(c) for purposes of the IRA HER Programs.

Sub-Alternative A: Specify that the parties authorized to receive utility customer information should include the Focus Program Administrator, Sub-Contractors to the Focus Program Administrator, the Focus Evaluator, Sub-Contractors to the Focus Evaluator, and Commission staff working on the IRA HER programs.

Sub-Alternative B: Specify other parties authorized to receive utility customer information pursuant to the Commission’s discussion.

Alternative Two: Do not grant a waiver of Wis. Admin. Code § PSC 113.0505(2) pursuant to Wis. Admin. Code. § PSC 113.01(2) for sharing of utility customer data or expressly authorize access to municipal customer data pursuant to Wis. Stat. § 196.137(2)(c) for purposes of the IRA HER programs.

Alternative Three: Other action consistent with the Commission’s discussion.

Alternative Four: Take no action.

Commission Alternatives – Data Sharing Agreements (applicable only if Alternative One is selected above.)

Alternative One: Commission staff and other parties authorized to receive customer data shall establish data sharing agreements with utilities prior to obtaining their customer data for IRA HER programs.

Alternative Two: Other action consistent with the Commission’s discussion.

Alternative Three: Take no action.

Income Verification Methodology

Income verification is a critical element of HER programs' implementation because rebate amounts vary based on household income. States may allow applicants to establish their income eligibility through a variety of means, including categorical eligibility (enrollment in recognized low-income programs), documentation of income, and self-attestation. According to U.S. DOE Guidance, a State must:

- Provide and enforce use of an acceptable method to verify that a participating household's income is less than 80 percent AMI;⁴⁵ a participating household's income is less than 150 percent AMI but greater than or equal to 80 percent AMI; a participating multifamily building has at least 50 percent of households with incomes less than 80 percent AMI; a participating multifamily building has at least 50 percent of households with incomes less than 150 percent AMI (but not less than 80 percent AMI).
- Allow categorical eligibility determinations based on other Federal programs that meet the required income thresholds, as listed in the Federal Programs Approved for Categorical Eligibility document, as well as other state-approved programs approved by U.S. DOE.
- Apply (and make available to claimants) up-to-date AMI data listed by U.S. DOE through an Application Programming Interface (API) or hotlink.

⁴⁵ HUD calculates median family income levels for areas across the U.S. HUD has a website available [here](#) where users can view these calculations. Information about HUD's methods for calculating AMI statistics is available [here](#). HUD typically updates these values in March or April of each year.

Regarding categorical eligibility, U.S. DOE Guidance states that households enrolled in any of the programs listed below are automatically eligible to receive the highest level of rebates available to households with incomes less than 80 percent AMI.⁴⁶ Participants enrolled in these programs are categorically eligible because the programs each require an income level that is equivalent to or less than the income requirements for the home efficiency rebates established by IRA. Table 9 lists the “Recognized Programs” that apply to both single family and multifamily buildings. Similar qualification practices already occur in the Low-Income Home Energy Assistance Program and Weatherization Program, and Commission staff and APTIM have been in communication with the state entity responsible for those programs, the Wisconsin Department of Administration’s Division of Energy, Housing, and Community Resources (DEHCR), to discuss whether the IRA HER programs could access enrollment information for these programs to provide customers with a low-barrier pathway for receiving approval to participate in the Wisconsin HER programs. For example, if a customer self-attests to being approved for a Recognized Program, they could state that in their application without providing documentation. The program implementer for income verification would then confirm the customer’s eligibility using the access to the aforementioned enrollment records. If it cannot be verified that the customer is enrolled in the in a Recognized Program, the program implementer would work the customer to go through the process to obtain documentation verifying the customer is enrolled in the recognized program. The programs which DEHCR can provide access are marked in the table below.

⁴⁶ U.S. DOE, State & Community Energy Programs. October 13, 2023. Federal Programs Approved for Categorical Eligibility for U.S. DOE Home Energy Rebates (“Recognized Programs”). https://www.energy.gov/sites/default/files/2023-10/ira-50121-50122-home-energy-rebates-categorical-eligibility-list_10-13-2023.pdf.

Table 9: Recognized Programs for Categorical Eligibility

Recognized Program	Eligible for Higher Level of Home Efficiency Rebates	Accessible to IRA HER Programs via DEHCR
Low Income Home Energy Assistance Program (LIHEAP)	X	X
Medicaid	X	X
Supplemental Nutrition Assistance Program (SNAP)	X	X
Head Start	X	
Lifeline Support for Affordable Communications (Lifeline)	X	
Food Distribution Program on Indian Reservations (FDPIR)	X	
National School Lunch Program – Free (NSLP)	X	
Housing Improvement Program (HIP)	X	
Housing Opportunities for Persons with AIDS	X	
Supplemental Security Income (SSI)	X	X
Weatherization Assistance Program (WAP)	X	X
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	X	
Verified government or non-profit program serving Asset Limited Income Constrained Employed (ALICE) persons or households	X	
Public Housing (housing owned and operated by Public Housing Authorities)	X	

U.S. DOE will allow states to select from the following methodological options for income verification:

- (1) Documentation of household income (for example, via 1040 tax forms);
- (2) Documentation of enrollment in a pre-qualifying program (categorical eligibility);
- (3) Self-attestation of either income level or enrollment in pre-qualifying program.

In discussions with the U.S. DOE, it has clarified that option 3 above represents situations when a household attests to their income or categorical eligibility and is approved for a rebate without providing supporting documentation. While the U.S. DOE Guidance affords states with this flexibility, U.S. DOE staff supporting the program team’s planning for the HER programs have

also acknowledged the legal risks and added compliance scrutiny that are likely to accompany this approach.

In addition, U.S. DOE requires states to agree to the following:

- (1) review information provided to support income eligibility for all applicants applying for rebates;
- (2) take steps to verify income eligibility for at least 50 percent of those applicants that use self-attestation to support income eligibility (e.g., confirm enrollment in at least one “Recognized Program” that the applicant asserted enrollment in);
- (3) after 6 months and not longer than 1 year after program launch, report to U.S. DOE the percentage and number of applicants that received rebates but were subsequently found to not meet eligibility requirements; and
- (4) work with the state's U.S. DOE project officer to institute additional safeguards or determine if a lesser level of review for applicants using self-attestation is justified depending on the percentage/number of rebates issued without meeting eligibility requirements.

The program team proposes to perform income- and categorical eligibility verification for 100 percent of households prior to granting approval for rebates. The draft plan documents propose allowing Wisconsin’s HER programs to use the first two methodological options listed above: 1) documentation of household income, and 2) documentation of enrollment in a pre-qualifying program (i.e., categorical eligibility). Focus has many years of experience verifying income for its Tier 2 residential rebates for residential HVAC and insulation and air sealing measures using these approaches. The program team proposes leveraging Focus’ existing income-verification processes whereby customers upload documentation using a secure online platform and working with a new vendor with capabilities to verify categorical eligibility for certain recognized programs (those listed under the Accessible to IRA HER Program via DEHCR column in the table above).

The program team is not proposing to allow self-attestation as a standalone income verification approach at this time. The program team has discussed options for self-attestation in emergency replacement situations. These may be circumstances when a household experiences equipment failure and may not be able to wait for the program to verify income eligibility or categorical eligibility before moving forward with equipment installation. However, details regarding how these emergency situations would be defined and measures the program would need to take to control for potential fraud have not been thoroughly explored.

Commission Alternatives – Income Verification Methodology

Alternative One represents the program team’s proposed approach for HER program income verification methodology. This approach would require that 100 percent of applicants seeking rebates at amounts that require verification of income are verified before approval of rebate payment. The methods used to verify income eligibility under Alternative One are either: 1) customer-provided documentation of their income or their enrollment in a recognized program or, 2) through a program vendor’s verification of a household’s existing enrollment in a recognized program. Alternative Two may be appropriate if the Commission wishes to modify the program team’s proposal by either allowing greater flexibility for income verification (e.g., allowing for self-attestation in emergency situations or other circumstances identified in stakeholder comments) or by limiting the income verification options to just one of the methodological options allowed by the U.S. DOE, consistent with its discussion.

Alternative One: Wisconsin’s IRA HER programs will allow income verification via documentation of household income or by categorical eligibility verified via documentation of enrollment in a recognized program or verification of enrollment in a recognized program performed by program staff prior to approval.

Alternative Two: The State of Wisconsin shall design its Income Verification Methodology consistent with the Commission's discussion.

Alternative Three: Remand the matter back to staff for additional information consistent with the Commission's discussion.

Approval of IRA HER Applications

The decision alternatives below seek the Commission's direction for how to proceed with finalizing the applications for the Wisconsin IRA HER programs. Alternative One would direct Commission staff to finalize the state's application packages for the HOMES and HEAR programs with modifications based on the Commission's decisions specific to the issues presented for decision in this memorandum. Alternative Two would direct staff to finalize the state's application packages for the HOMES and HEAR programs with modifications based on the Commission's decisions on issues presented in this memorandum and any additional modifications to the applications, consistent with the Commission's discussion. Alternative Three would remand the application packages back to Commission staff to allow for additional information gathering and analysis to be incorporated into the application packages before they are submitted to the U.S. DOE.

Commission Alternatives – Approval of Application Packages

Alternative One: Approve the applications for the IRA Home Energy Rebate programs, with modifications, based on the decisions above.

Alternative Two: Approve the applications for the IRA Home Energy Rebate programs, with modifications, based on the decisions above and to incorporate further modifications pursuant to the Commission's discussion.

Alternative Three: Remand the applications for the IRA Home Energy Rebate programs back to staff for further information and analysis pursuant to the Commission’s discussion.

U.S. DOE Application Curing and Supplemental Documents

Prior to award, U.S. DOE may require modifications to Wisconsin’s application and blueprint materials. These modifications may arise in application review process and during the negotiation of the award contract. In addition, there are additional documents that the state will need to file with U.S. DOE including a Privacy and Security Assessment, Evaluation Plan and a Market Transformation Plan. While these documents are not required for the application, they will be required to launch and continue the operation of the program.

To keep these programs on track for a timely launch and continued operation, the Commission may consider whether to grant ongoing authority to the Delegated Commissioner or the Division Administrator to cure any final edits to the application materials prior to execution of an award as well as the submittal of the supplemental documents.

The Delegated Commissioner has authority to participate, on behalf of the Commission, in the day-to-day administrative activities relating to the Office of Energy Innovation (OEI), with authority to act on behalf of the Commission, subject to the Chairperson’s discretion to schedule any matter for full Commission discussion and/or decision, in matters relating to: (ii) negotiation and execution of any contract, agreement or memoranda of understanding between OEI and other agencies or providers. ([PSC REF#: 444730 at pg. 3.](#))

The Commission may choose to delegate its authority to make edits to application to the Delegated Commissioner under Alternative One, or to the Division Administrator under

Alternative Two. Under Alternative Three, any U.S. DOE requested edits and additional supplemental documents would come back to the full Commission for review and decision.

Commission Alternatives – Application Curing and Supplemental Documents

Alternative One: Delegate to the Delegated Commissioner the authority to work with OEI to make edits to the final application materials and supplemental documents.

Alternative Two: Delegate to the DACEA Division Administrator the authority to work with OEI to make edits to the final application materials and supplemental documents.

Alternative Three: Bring any application curing edits requested by U.S. DOE and supplemental documents back to the full Commission for final review and decision.

Alternative Four: Other action consistent with the Commission’s discussion.

Alternative Five: Remand the matter back to staff for further information.

JF:TK:JP:JS:MH:kle DL: 01989355

Attachments:

- Attachment 1-HOMES Application Narrative
- Attachment 2-HOMES Community Benefits Plan
- Attachment 3-HOMES Consumer Protection Plan
- Attachment 4-HOMES Education and Outreach Plan
- Attachment 5-HOMES Utility Data Access Plan
- Attachment 6-HEAR Application Narrative
- Attachment 7-HEAR Community Benefits Plan
- Attachment 8-HEAR Consumer Protection Plan
- Attachment 9-HEAR Education and Outreach Plan
- Attachment 10-Stakeholder Outreach Summary

ATTACHMENT 1

STATE OF WISCONSIN IRA HOME EFFICIENCY REBATES (HOMES) PROGRAM, SECTION 50121 APPLICATION NARRATIVE DRAFT

March 25, 2024

DRAFT

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USE OF FUNDS AND REBATE ELIGIBILITY

Section 3.1.1 Use of Funds

1. Provide which types of allowable costs the state proposes within each category of **administrative funds** and **rebate funds** and within those categories:

Note: These responses should correspond with the Standard Form 424, Standard Form 424A, and [Budget Justification Workbook](#).

Please note that “rebate funds” indicate the remaining amount of grant funds after subtracting “administrative funds”.

- Program planning and design
 - The state will contract with a third-party administrator, Aptim Government Solutions LLC (Aptim), an independent evaluator, The Cadmus Group LLC (Cadmus); a fiscal agent and system administrator, Wipfli LLP (Wipfli); a compliance agent, Baker Tilly US LLP (Baker Tilly); and an income verification services firm, Energy Services, Inc. (ESI).
 - Aptim, as third-party administrator will subcontract to implementation firm(s) to perform specific functions of the program work.
 - All of these entities, with the exception of ESI are currently involved in the delivery of the Focus on Energy Program. All of these entities have expertise in designing and delivering efficiency programs, with proven success in market uptake, sound installations, income verification, and delivering benefits to low-income households.
- State Energy Office Program staff
 - The state plans to hire 2 full time staff members, with the intent that their time will be split amongst the Home Efficiency (Sec. 50121) and Home Electrification and Appliance (Sec. 50122) awards. Our accounting systems have the ability to separately track these different funding sources and internal policies are in place to ensure the time is accurately tracked.
 - The state also has 4 team members supporting the Focus on Energy program at the PSC, these staff will also provide ongoing support for the programs in a part-time capacity.
- Development of tools and systems, including websites, applications, rebate processing, and reporting
 - The third-party administrator’s sub-contracted implementer(s) will develop user interfaces and systems for households, contractors, and others to use to apply for rebates, submit required documentation, etc., including income verification.

- The systems administrator and fiscal agent will collaborate with the third-party administrator's sub-contracted implementers to ensure that the data can flow smoothly into the system of record and to the fiscal agent system for payment.
- This work may include the development of an application programming interface (API) which would allow the efficient delivery of data related to categorical program eligibility and utility data, thereby expediting income verification and improving the customer experience.
- Program evaluation and consumer satisfaction surveys
 - Dependent on the design of a to be developed evaluation plan, Cadmus, the program evaluator may conduct focus groups, interviews, and/or consumer surveys to assess the effectiveness of program outreach and delivery, and satisfaction with rebates and products.
- Program monitoring and audits
 - In addition to state staff monitoring program delivery and overseeing the third-party administrator and their implementation contractor(s), the state will also contract with the compliance agent to perform this compliance work and provide assistance on responding to state or federal inquiries.
 - The third-party administrator, their sub-contracted implementation contractor(s) and other providers will also be required to fulfill data reporting and analysis per their contract.
- Consumer protection functions including resolution procedures, data review, contractor management, installation standards, and continuous improvement.
 - In response to findings from periodic assessments of program performance (as well as any identified problems that arise throughout implementation), the state or the third-party administrator will institute changes to address deficiencies in program delivery (or design).
 - The state will develop consumer protection guides or one-pagers that will be provided to all rebate applicants as one part of the consumer protection strategy.
 - The third-party administrator and their sub-contractors will utilize Focus on Energy's existing phone system and dedicate program staff to respond to consumer questions and/or complaints. The third-party administrator may create a dedicated phone line to serve this Program which would be managed through the existing phone system.
 - State staff will regularly review the third-party administrator and sub-contracted implementers data submissions.
- Marketing, education, and outreach.
 - The state has held five in-person and two virtual (i.e., online) community engagement sessions to better understand community interests and inform the program design.
 - The state has held eight contractor engagement sessions to better understand the interests of the state's network of trade allies and to inform program design.
 - The state will conduct separate outreach to retailers, product manufacturers and distributors.

- The state, potentially with assistance from its implementation contractors or outside experts and partners, will develop marketing and education information for homeowners, tenants, retailers, contractors, and others as needed.
- Implementation contract cost not including rebates and costs for activities directly related to delivery of rebates.
 - The implementation contractor(s) will use administrative funds for data review and reporting, and to fulfill other programmatic management requirements.
 - The third-party administrator will provide oversight of implementation contractor(s) and other service provider costs/contract management; data review and reporting.
- Contractor training
 - Contractor training and/or review of a contractor’s certification(s) will be required before a contractor is placed on the qualified contractor list.
 - Training specifically to assist contractors in participating in the rebate program will be made available.
 - Additional training funding will exist with the TREC 50123 program which will be put out for a competitive grant program in Q3 2024 by the State Energy Office.
- Activities to improve access to rebates, facilitating leverage of private funds and financing mechanisms (e.g., loan loss reserves, interest rate reductions) where beneficial to efficiency and/or electrification projects.
 - Depending on availability of resources, the state will engage financing organizations (e.g., green banks) to assist in making low- cost financing (or other incentives including the potential to establish and apply loan loss reserves) available to rebate applicants and providers (e.g., contractors).
- Technical assistance
 - Depending on availability of resources, the state and/or its implementation contractor(s) may provide technical assistance either directly or through specialized organizations to assist entities focused on serving disadvantaged communities and/or other priorities.

a. Provide the total amount of estimated administrative funds to be expended annually:

The state is expecting these funds to last approximately 5 years. Therefore, the annual administrative expenditure is calculated on that assumption.

Program	Total Allocation	Administrative Budget (20%)	Annual Expenditure
HOMES	\$74,904,830	\$14,980,966	\$2,996,193

- b. Provide the total amount of estimated project-related costs as a portion of the rebate funds to be expended annually:

Budget details will be provided as part of the final DOE application submission.

2. If requesting additional rebate funds for project-related activities, describe and justify each activity and associated budget in the budget justification worksheet.

The state would like to request using **rebate funds** to cover the following types of project-related activities:

- a. The State of Wisconsin requests using rebate funds to cover the cost of home energy assessments and the associated energy savings modeling for households verified as low-income (i.e., earning less than 80% AMI) and/or households located in disadvantaged communities (DACs) only when no other alternative source of funding is available to assist in offsetting the cost for a home energy assessment.

Anticipated Spending Level

TBD

Description of the Proposed Work

The state proposes to reimburse the cost of a home energy assessment and the associated energy savings modeling for verified low-income households and households in DACs. Reimbursement of these costs will only be allowed when the following conditions can be verified by the program:

- No other alternative source of funding is available to assist in offsetting these costs.
- The home energy assessment and associated energy savings modeling is performed by a contractor on the program's qualified contractor list.
- The modeling software used to perform the assessment is consistent with the BPI-2400 standard.

Justification

Home energy assessments are a required step in the process for any household interested in participating in the HOMES program. Discussions with program implementers and contractors in the state suggest that the average cost of a home energy assessment in Wisconsin may be approximately \$500, though estimates as high as \$800 have also been discussed. The state anticipates that the up-front cost of a home energy assessment is likely to be a financial barrier to

entry for low-income households and, as a result, may discourage them from taking the necessary first steps toward participating in HOMES.

Administrative funds will be used to support the many functional requirements of program operation including; outreach and education, income-verification, data systems and tools, rebate processing, tracking and reporting, customer satisfaction surveys, consumer protection functions, compliance monitoring and audits, and evaluation. The state anticipates these administrative funds may not be sufficient to also assist low-income households and households in DACs with the financial assistance necessary to start these customers along the HOMES participation path by completing a home energy assessment. The state is proposing to use rebate funds to pay for home energy assessments to bolster program participation among the households of the state that stand to benefit most from program rebates: frontline communities that have the highest energy burdens and have experienced disproportionate health, environmental, and economic impacts of emissions and pollution.

The State of Wisconsin is aware that certain entities in the state already offer, or plan to offer, programs to cover all or a portion of the cost of home energy assessments that may enable households to participate in HOMES. The Wisconsin HOMES program will coordinate with these entities to ensure their funds are the first option for low-income households interested in participating in HOMES but require financial assistance to cover the cost of a home energy assessment. Prior to approving payment for a home energy assessment using rebate funds, the State of Wisconsin will verify the household qualifies as low-income and is not eligible to receive financial assistance for a home energy assessment from an alternative source and that the modeling software used to perform the assessment is consistent with the BPI-2400 standard.

- b. Costs for technical and customer service support performed by Community Based Organizations (CBOs) serving low-income populations and disadvantaged communities (DACs).

Anticipated Spending Level

TBD

Description of the Proposed Work

The state anticipates releasing a **Request for Qualifications** to identify CBOs interested in serving as program partners. The following list describes what

services the state anticipates CBOs providing to low-income households and households living in DACs to improve the efficiency and effectiveness of program delivery.

- Providing information to households about the program to guide them through the participation process and direct them toward appropriate resources. This may often be one-on-one outreach with households.
- Assisting households in selecting contractors and guiding them through the types of questions to ask contractors.
- Reviewing energy assessment reports to discuss results and options for rebates and other sources of funding assistance.
- Advise and assist a homeowner who may be navigating projects performed by multiple contractors (e.g., providing contractor lists, helping set up appointments, and understanding contractor bids).
- Assisting households through the income-verification process.
- Assisting households submitting documentation required to receive a rebate.

Justification

The State of Wisconsin proposes using rebate funds to compensate CBOs that commit to partnering with the program to support the participation of low-income households and households living in DACs. Administrative funds will be used to support the many functional requirements of program operation including: outreach and education, income-verification, data systems and tools, rebate processing, tracking and reporting, customer satisfaction surveys, consumer protection functions, compliance monitoring and audits, and evaluation. The state anticipates these administrative funds may not be sufficient to also support efficient and effective delivery of the program to those households of the state that stand to benefit most from the emerging clean energy economy: frontline communities that have the highest energy burdens and have experienced disproportionate health, environmental, and economic impacts of emissions and pollution.

The following lists offers additional information the state has considered in justifying its use of rebate funds to cover project-related costs for technical and customer services performed by CBOs serving low-income populations and DACs.

- The state recognizes the value of CBOs as trusted resources working on behalf of low-income households and households living in DACs.

- The state understands that CBOs will be essential to building relationships in low-income neighborhoods and DACs and in supporting efficient and effective deliver of the HOMES program to those communities that stand to benefit the most. The relationships CBOs have built up within the communities they serve can help in overcoming barriers to participation (e.g., informational barriers, decision-making barriers, transactional barriers).
 - Throughout the program planning stage, stakeholders stressed the need to establish meaningful partnerships with CBOs throughout the state to help the program reach those households that stand to benefit most from its investments.
 - Compensating CBOs for their time and expertise is a recognized industry best practice. A CBOs lived experience in DACs will improve the state's understanding of the barriers to participation and how the program can adapt its design and delivery appropriately throughout the program's life.
 - The U.S. DOE's guidance states that it strongly encourages states to establish partnerships with and provide funding to CBOs that represent or work with underserved households to reach and engage with these communities effectively over the life of the program. The state will strive to meet the U.S. DOE's expectations and outcomes for the HOMES program. Using rebate funds to compensate CBOs for their technical and customer support services is an important component to the state's overall strategy to ensure traditionally underserved households are able to take full advantage of the program.
3. Describe how the state will manage and ensure that rebate minimums and administrative maximums are adhered to over the duration of the program.

Administrative Efficiencies

The state will take a number of steps to reduce the costs of administration and project-related activities. The state plans to use the DOE Rebate Tracking System to minimize the costs of data tracking and reporting. By making use of the Tracking System's API (available to states, vendors, modeling tools, etc.), the state will dramatically reduce the need for repeated data entry and associated errors, and simultaneously ensure much greater data consistency through the use of the DOE/Pacific Northwest National Laboratory (PNNL) data specifications.

In terms of ensuring that administrative limits are maintained, the state will closely track and report spending both within this category as well as funds that are provided as rebates and as incentives to contractors. The state will also follow Generally Accepted Accounting Principles (GAAP) and conduct audits as necessary through the contractor Baker Tilly.

Rebate Funds Management

The state will use the DOE Rebate Tracking System and its accompanying coupon feature to ensure that rebate amounts comply with program requirements. Rebate applicants will only be approved for the rebate amounts (and percentages) associated with their income level (e.g., below 80% AMI) and the modeled associated with allowable improvements. The DOE Rebate Tracking System will include a database with records of all previously issued rebates to individual residential dwellings. In order for a coupon to be generated, the system will query the database to ensure that a Home Efficiency Rebate has not already been redeemed for that address or that a non-expired coupon is still in place for that address.

The state will also use the DOE Rebate Tracking System to track the amount of rebate funds committed to date, and only approve new requests for rebates if sufficient funds remain. When the system issues a coupon, it will simultaneously put into place a “reservation” of funds (equivalent to predicted value of that coupon) that will remain in place until either the coupon is redeemed or the coupon expires, whichever is first. The state also plans to establish reserves within the DOE Rebate Tracking System to ensure that sufficient funds are in place (and maintained) for specific uses (e.g., minimum of 50% of rebate funds for low-income, with at least 10% for low-income multifamily).

Section 3.1.2: Rebate Conditions and Levels

4. Provide the maximum rebate amounts that will be offered within the allowances of the Home Efficiency Rebates requirements. (See Tables A-1 and A-2 in the Appendix)
*States may increase the maximum amount available for low-income households upon approval from DOE.

[PENDING COMMISSION DECISION] For households with incomes greater than 80% AMI but less than 150% AMI, our state will use the maximum levels noted in Appendix Tables A-1 and A-2. See our response to Question #12 for information on rebate maximums available to households with incomes less than 80% AMI.

5. Identify the allowable project costs for determining rebate levels when based on project cost.

Allowable project costs include all energy efficiency improvements (equipment and installation/labor) associated with the anticipated energy savings. For households with incomes less than 80% AMI, allowable project costs may also include related project costs (e.g., home assessments, energy audits, and project quality assurance) given that low-income households will not be able to pay for these additional requirements and do not have access to other programmatic resources to cover these costs.

6. List the documentation requirements related to project costs from residents, building owners, contractors, and/or aggregators.

For each project, each contractor or eligible entity representative (EER) must provide an invoice with the following information:

- Customer name.
- Installation address.
- Contractor name.
- Contractor address.
- Contractor phone number.
- Dates on which the work was performed.
- Date of project completion.
- Model numbers for heating, cooling, and hot water systems
 - geo-coded photos of installations that include model numbers are acceptable.
- Line-item costs of:
 - Equipment.
 - Materials.
 - Labor costs.
 - Assessment, inspections, testing, modeling, permitting (if applicable).
- The total project cost prior to the rebate.
- The total rebates the customer is eligible for including HOMES and any other rebate programs, such as Focus on Energy, utility, municipal, or other 3rd party programs.
- The estimated tax credit the customer may be eligible for (optional).
 - This is for informational purposes only and should not have an impact on the final project cost.

The invoice must be signed and dated by the homeowner or building owner and must include rebates applied to the bill.

7. Describe how homeowners and multifamily building owners will be informed of additional program funding available from non-federal funds and grants.

Defer response to State Implementation Blueprint.

The [IRA Home Energy Rebates | Focus on Energy](#) webpage will be the landing place for the most up to date information on program status, process and detail on rebate stacking with Focus on Energy and other funding sources.

8. Provide the date after which upgrade projects must be completed for the purposes of being eligible for a rebate under the state program.

For projects initiated after the state's program launch, the contractor or aggregator must submit all required documentation and information, as noted in the [Data & Tools Requirements Guide](#), not less than 60 DAYS after project completion.

[PENDING COMMISSION DECISION]

Households that apply to receive a rebate for a completed home upgrade project that began on or after August 16, 2022, but initiated before the state's program launch, are still subject to all final program requirements. They will be required to provide all information noted in the Data & Tools Requirements Guide as well as documentation certifying and demonstrating that the upgrade project meets all program requirements, including the use of a contractor on the state's qualified contractor list, assessment requirements, etc.

9. Identify whether, for low-income multifamily buildings, the state will calculate the "per dwelling unit" rebate amount at the less than 80% AMI amount for all units or based on the ratio of low-income to non-low-income units.

At the less than 80% AMI amount for all units

Based on the ratio of low-income to non-low-income units

10. Describe how the state plans to value energy savings based on time, location, or greenhouse gas emissions. The application must demonstrate a strategy for either prioritizing, or requiring in program rules:

- a. Retrofits that will have a disproportionate benefit based on the time or location of energy savings; or
- b. A targeted approach to prioritize reduction in greenhouse gas emissions.

The state will prioritize reductions in greenhouse gas emissions by focusing efforts on homes heated with delivered fuels and electric resistance systems. Greenhouse gas reductions will be accounted for in evaluation and will not be a consideration for qualification of a household's energy model.

11. Describe how the state plans to ensure and verify ENERGY STAR certification at the time of installation for heating, cooling, and water heating products.

The state will require installers to include model numbers and geo-coded photos for all heating, cooling, and water heating projects. The state will then review this information to ensure that equipment complies with requirements. Upon review, if an installer installs equipment that is not ENERGY STAR certified, they will receive a warning notice. If they install non-qualifying equipment a second time, the state will remove the installer from the qualified contractor list.

The state will ensure major distributors and retailers understand the rebate requirements and ask them to refer to the EPA's Qualified Products Lists on a regular basis or, preferably, have an automated method of keeping the information up to date through a link to EPA's Qualified Products Lists if available.

12. A state interested in offering higher rebates amounts than those listed in Table A-1 and Table A-2 in the Appendix for low-income households must describe (in the below box) the state approach for balancing higher rebate amounts (serving fewer households) with the required allocation to serve low-income households and must propose the maximum rebate amount that would be available to low-income households both in terms of percentage of project cost and dollar amount for low-income households.

[PENDING COMMISSION DECISION] The state is proposing higher allowable rebates for low-income households subject to DOE approval. For projects in low-income single and multifamily buildings, with modeled savings of 20% up to 34%, the state plans to allow the lesser of the following per home or unit.

- o % of project cost: 100%
- o \$ amount: \$5,000

For projects in low-income single and multifamily buildings, with modeled savings of at least 35%, the state plans to allow the lesser of the following per home or unit.

- % of project cost: 100%
- \$ amount: \$10,000

Households with incomes below 80% AMI are unlikely to be able to afford to cover any additional out-of-pocket expenses. The limits provided in guidance are too low in most cases to cover a project that must reach at least 20% energy savings. Our state does not want to place additional burdens on low-income households and therefore requests rebates cover 100% of the costs up to \$5,000 for projects modeled to achieve 20-34% energy savings and up to \$10,000 for projects modeled to achieve 35% or greater energy savings.

Contractors will be required to include all other available rebates, including Focus on Energy and other utility programs, before applying HOMES rebates. Due to these stacking opportunities the HOMES rebates may not need to cover 100% of project costs. The state will establish verification processes and procedures to ensure that the combination of HOMES rebates stacked with other allowable rebates do not exceed total project costs.

The state is particularly interested in HOMES rebates being practical for low-income households given they're more likely to live in homes where whole-home retrofits can save a lot of energy and reduce utility bills. By raising these limits for low-income households, the state is making our rebate program a viable source of funding for households who otherwise would likely be unable to carry out these projects.

13. Provide details on what portion(s) of the total rebate will be provided to the homeowner/building owner compared with the contractor/aggregator.

Consistent with the DOE/PNNL workflows, if the contractor chooses to provide an instant discount, the contractor will be required to deduct the entire rebate amount associated with the modeled energy savings projected when initiating the rebate reservation. The rebated amount must be included on the invoice that the homeowner must sign before the contractor/aggregator can receive the rebate reimbursement.

- a. Describe what caps the state will place on contractor/aggregators in terms of savings exceeding the amount associated with the rebate provided to the homeowner (e.g., allowable percentage above the rebate provided to homeowner).

N/A.

14. Describe what systems will be put into place to reserve funds for each measured project, given the need to remit payment to the contractor/aggregator after 9-12 months of usage data post-energy upgrade is available.

N/A.

15. For the measured program path, describe how the state will calculate rebate levels based on average home energy usage in the state.

N/A.

16. For the measured program path, within what timeframe will the state provide rebates to eligible rebate recipients?

N/A.

Section 3.1.3: Low-Income Homes

Note: Low-income households are defined as households with less than 80% Area Median Income (AMI). HUD calculates median family income levels for areas across the U.S. HUD has a website available [here](#) where users can view these calculations. Information about HUD's methods for calculating AMI statistics is available [here](#). HUD typically updates these values in March or April of each year. (see the [Program Requirements & Application Instructions](#) document Section 2.1)

17. What portion of the rebate funds will the state reserve for low-income households and multi-family households?

[PENDING COMMISSION DECISION] The state plans to allocate **[39.3%]** of rebate funds to low-income households. This is **consistent with (or greater than)** the percentage of low-income households in our state, which is 39.3%.

The state plans to allocate a minimum of **[10%]** of rebate funds to low-income multifamily buildings.

18. Describe how the state will define household income for verification purposes (e.g., using prior year income).

For households that provide income information, the state will request a sum of the income of all adult occupants over the past 12 months. Information from prior tax year earnings will also be acceptable. As long as the income requirements of identified federal programs fall below 80% AMI and/or 150% AMI, applicants enrolled in a program that qualifies them as categorically eligible do not need to provide this income information.

For households applying for funds retroactively, customers will need to demonstrate they qualified via categorical method or by household income at any time from Aug 16, 2022 until the official program launch.

The state will follow the same household eligibility definitions that Focus on Energy used in 2023, as follows:

Eligible Household Members

All individuals living in the household at the time of application submittal (related, unrelated, or living together in the dwelling) are household members. Persons living in a housing arrangement with their own room who share common spaces are considered part of the household. Applicants must include all eligible household members on the Income Eligibility Application.

- Children
 - Children living with parents 50% of the time (50% custody) are counted.
 - If the parent claims the child on taxes, they can claim them as household members.
 - Some situations have one parent claim children on taxes one year, and the other parent claim them the next (still typically 50/50 custody)
 - Children living in household only every other weekend are not counted.
- Medical Attendants:
 - Live-in attendants are considered eligible Household Members if:
 - Live in the household full time (24/7).
 - Do not have another residence.
- Roomers/Boarders/Renters

- Considered eligible if they have no other address and shared common spaces.
- Anyone living in the household for more than 3 months with no other address.

Ineligible Household Members

- Roomers/Boarders/Renters
 - A Roomer is a person who rents a sleeping room from the building owner. A roomer does not have a separate site address from other occupants of the building. A roomer does not share in providing or being provided the necessities of life for other residents of the structure. A roomer is a person who has proof of a permanent address but occupies a single room within the rooming house. A roomer in a single-family structure must verify he or she is not part of the economic unit of the other tenants of the structure.
 - A Roomer is considered an eligible household member if they are living in a housing arrangement with their own room and sharing common spaces (such as kitchens, living rooms, TV rooms, recreation rooms). Persons sharing common spaces are part of a household with other members and eligibility must be assessed for the whole group with regards to SMI household size.
- Temporary Residents/Household Members
 - Individuals who are not permanent residents of the household and will be living in the household for less than 30 days after application submission. Temporary Residents include individuals who lived in the household during a portion of the preceding three months but are not living in the household at the time of application submittal.
- Foreign Exchange Students
 - Students from another country attending school on an exchange Offering and living in the household.
- College Students
 - Unless they live in the household full-time and do not have another residence (i.e., dorm room or apartment).
 - Are not considered household members even if home for the summer.
- Foster Children
 - Children of the customer who have been placed under foster care, who are orphaned, neglected, or delinquent and are not living in the household. (Foster children that the customer has taken in are counted as part of the household).

- Medical Attendants
 - Attendants who do not live in the household, and do not share in providing or being provided the necessities of life.
 - Note: If attendants live in the home full-time, see eligible Household Members.
- Military on Active Duty
 - A household member who is currently on active duty and deployed or has been called into active duty and is to be out of the household for at least 60 days. The base income of this individual should not be included on the application, but any household support provided to maintain the household (i.e., housing allowances, allotments sent directly to the household for support) should be listed on the Income Eligibility Application and should be counted as household income.

Household Member Income

- Income should not be included for any individuals who are not considered eligible household member.
- Earned income of minors under the age of 18 (or full-time high school students over the age of 18) should not be included. However, non-earned income such as Social Security benefits must be counted. This includes regular Social Security Benefits, Social Security Death (Survivor) Benefits, Social Security Disability Income, and Supplemental Security Income (SSI).

19. For single-family households, describe what combination of methods will be used for claimants to be able to establish their household income for income qualifications.

States may select the following options:

[CHECK ALL THAT APPLY:]

- Documentation of household income (for example, 1040)
- Documentation of enrollment in a pre-qualifying program
- Self-attestation of income level
- Self-attestation of enrollment in a pre-qualifying program

*Households that are enrolled in a pre-qualifying program for the HOMES rebates will be asked to provide documentation of enrollment in that pre-qualifying program **only** if the state is unable to verify enrollment via the program's database.*

The state will recognize any of the following documentation for income to establish that a household is eligible: 1040 from prior year, W2 forms, and wage statements/payroll.

The state also plans to offer categorical eligibility for the following programs listed in Tables A-3 and A-4 in the Appendix provided by DOE:

- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Head Start
- Lifeline Support for Affordable Communications (Lifeline)
- Food Distribution Program on Indian Reservations (FDPIR)
- National School Lunch Program – Free (NSLP)
- Housing Improvement Program (HIP)
- Housing Opportunities for Persons with AIDS
- Supplemental Security Income (SSI)
- Weatherization Assistance Program (WAP) –
 - 80% AMI is greater than 200% FPL for 1-5 person households in each of Wisconsin's 72 counties. In households of 6+ members 80% AMI is less than 200% FPL. Therefore, the state will allow categorical eligibility for WAP only for households with 1-5 members.
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) –
 - Per the State of Wisconsin's published WIC Income Eligibility Table, 80% AMI is greater than 185% FPL for all household sizes in every county in Wisconsin except the following counties: Ashland, Barron, Bayfield,

Buffalo, Burnett, Clark, Crawford, Florence, Forest, Grant, Green Lake, Iron, Jackson, Juneau Lafayette, Langlade, Marinette, Marquette, Menominee, Oconto, Polk, Price, Richland, Rusk Sawyer, Shawano, Taylor, Vernon, Vilas, Washburn, Wood, Manitowoc, Oneida, Monroe, Pepin, Dodge Lincoln, Rock, Trempealeau, Waupaca, Dunn, Sauk, Door. Households that are not categorically eligible may still apply for higher rebates amounts through the income verification method.

1-8 member households that are under 80% AMI and are categorical eligibility are:

Fond du Lac County, Sheboygan County, Winnebago County, Douglas County, Chippewa County, Eau Claire County, Racine County, Portage County, Marathon County, Walworth County, Jefferson County, La Crosse County, Green County, Kenosha County, Brown County, Kewaunee County, Iowa County, Columbia County, Milwaukee County, Ozaukee County, Washington County, Waukesha County, Calumet County, Outagamie County, Dane County, Pierce County, Saint Croix County

- Verified government or non-profit program serving Asset Limited Income Constrained Employed (ALICE) persons or households
- Public Housing (housing owned and operated by Public Housing Authorities)

20. For multifamily buildings, describe what combination of methods will be used to verify that at least 50% of dwelling units consist of households with incomes less than 80% AMI.

To qualify for low-income rebate amounts, multifamily building owners will be required to demonstrate that at least 50% of dwelling units consist of households with incomes less than 80% AMI through either of the following methods:

OPTION 1: Provide documentation (as described in our response to question #19) demonstrating that at least 50% of households either have incomes below 80% AMI or are enrolled in any of the programs listed in question #19.

OR

OPTION 2: Provide documentation that demonstrates that one of the following categories applies to 50% of the units in the multifamily building:

- Public Housing (housing owned and operated by Public Housing Authorities)

- Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)
- Privately-owned multifamily buildings that house residents receiving tenant-based assistance
- Section 42 Low Income Housing Tax Credit (LIHTC)

21. Please confirm the following:

- a. Claimant will be required to note the number of individuals who occupy the dwelling unit.
- b. Claimant will be required to sign an affidavit attesting to the validity of all information provided (e.g., enrollment documents, household income, number of full-time occupants) irrespective of the method of income qualification (e.g., categorical eligibility, self-attestation).
- c. State's intake system for users to provide income information will display the 80% AMI value for that household's ZIP code and household size to assist the household in comparing its income with those levels prior to signing statements regarding their income.

Yes, the state confirms the above statements.

22. Describe how the 80% AMI levels for each location will be kept up-to-date (use DOE-provided API, other) and linked to DOE systems. Confirm that these levels will correspond to (a) the address of the home at which rebates will be applied and (b) the applicable number of household occupants.

Defer response to State Implementation Blueprint.

The state plans to use the DOE provided API to compare an applicant's household income, occupancy number, and address to the appropriate 80% AMI level to determine income eligibility and level of rebate.

23. Confirm that the state will:

- a. Review information provided to support income eligibility for all applicants applying for higher income-based rebate levels.

Yes, the state confirms the above statement.

- b. Take steps to verify income eligibility for at least 50% of those applications that use self-attestation to support income eligibility (e.g., confirm enrollment in at

least one program that the applicant asserted enrollment in; confirm household income via Income Verification Express Service or other methods as applicable).

Yes, the state confirms the above statement.

- c. After 6 months and not longer than 1 year after program launch, report to DOE the percentage and number of applicants that received rebates but were subsequently found to not meet eligibility requirements.

Yes, the state confirms the above statement.

- d. Work with the state's DOE project officer to institute additional safeguards or determine if a lesser level of review for applicants using self-attestation is justified depending on the percentage/number of rebates issued without meeting eligibility requirements.

Yes, the state confirms the above statement.

- e. If applicable, propose the types of information that the state will provide to DOE to warrant reducing this requirement (e.g., allowing implementers to verify income of a subset of claimants through random sampling).

N/A. The state will not reduce this requirement.

24. Provide additional information as needed to demonstrate that the proposed approaches for income verification will address all types of households; not create undue burden for claimants; and include safeguards to minimize error and abuse in the process of verifying income.

By offering a variety of methods to demonstrate eligibility, including a wide range of programs recognized as providing categorical eligibility, the state believes that those in the lowest income brackets will have a range of options to demonstrate their eligibility.

As a safeguard to discourage applicants from falsifying income information, all applicants, when submitting income verification information, will be required to sign an affidavit as well as confirm that they understand the following:

If the information provided is invalid and warrants you ineligible for this rebate, the rebate reservation, if not processed, will be canceled. If the

rebate has already been applied to a purchase or service, the homeowner or building owner will be responsible for repaying the state for the rebated amount in addition to a fine not to exceed [TBD]. The state reserves the right to engage a bill collection agency should repayment not be made within a stated period.

To further minimize error in this process, the state will conduct a review of each applicant's income information prior to issuing a rebate coupon and giving the go-ahead to begin work. This delayed approval is workable given the complexity of whole home retrofits. Furthermore, the state will encourage applicants to provide income information as soon as possible so that review can be concurrent with other steps such as the contractor creating a scope of work. Applicants will be notified of their status (whether they qualify as below 80% AML) within [3] days of submitting their information.

25. Describe how the state will verify (confirm legitimacy) income information for all claimants (e.g., verification within 2 days through IRS, cross-check with enrollment databases of approved programs, calls to employers). If applicable, propose the types of information that the state will provide to DOE to warrant reducing this requirement (e.g., allowing implementers to verify income of a subset of claimants through random sampling).

- N/A. The state will not reduce this requirement.
- Defer response to State Implementation Blueprint.

The state will use a combination of implementation contractors to collect income data and verify it through submitted income documentation, enrollment databases of approved programs, calls to employers, and/or other DOE-approved means of income verification. This information will be submitted through an online portal and reviewed by implementation staff. If a customer is unable to access the portal, or otherwise needs assistance, they can call into the Focus on Energy contact center.

The implementation contractor will review all documentation and track any errors. Based on the overall rate of false eligibility claims of [5%] or less, the state will work with DOE to determine whether the state can move to reducing the review process (that is, reviewing a lower percent of applications with documentation).

The state will have the ability to confirm customer eligibility in qualified programs.

26. Describe how the state will resolve instances when rebates are provided to those who have falsified their incomes.

As soon as the information is determined to be incorrect (with review time projected as [3] days), the implementation contractor's system will automatically do the following:

- (1) Cancel the coupon reservation.
- (2) Inform the homeowner or building owner (and contractor/eligible entity representative where applicable) via one of any contact information provided (emails, home address) that the coupon has been canceled and can no longer be applied.
- (3) Inform the homeowner or building owner that (a) their income eligibility information has been found to be insufficient or invalid, and they are no longer eligible for the requested rebate; or (b) in cases where additional information may establish their eligibility, they can reapply for consideration but will only be issued a new rebate coupon after that information is confirmed or (c) should the homeowner or building owner believe that the state's review is incorrect, they can petition a re-review within 30 days via a provided address, email, or call-in number.
- (4) If applicable, inform the homeowner or building owner (and contractor/eligible entity representative where applicable) that the household is eligible for the lesser rebate percentage cap (50%) and a new coupon can be requested.
- (5) Inform the homeowner or building owner that IF the rebate has already been applied at point of sale (by retailer, vendor, contractor/eligible entity representative), the homeowner or building owner must reimburse the state (via a provided address or through a provided call-in number via credit card) within 30 days for any rebate amount incorrectly applied with any additional requirement information. If the homeowner or building owner does NOT provide this reimbursement to the state within the allowable period, the state will file the claim to a collection agency and the homeowner or building owner will be subject to additional penalties per that process.
- (6) Inform the contractor/eligible entity representative that if they have already performed the work and applied the rebate to the invoice, it is the homeowner or building owner's responsibility to pay back the state for the applied rebate.
- (7) In any instances where a rebate is provided to a homeowner or building owner that is found to not meet income eligibility requirements, the state will bill the homeowner or building owner for the rebated amount.

27. If proposing to allow self-attestation as a means for initial income qualification, provide a detailed description of how and when this approach will be used. Include statements, language, and detailed information regarding follow-up steps that will be used for this process. Additional topics to address include:

- a. Describe how those applying for rebates will be warned of potential liability associated with falsifying information.
- b. Explain how signed statements of self-attestation will be securely stored.
- c. Identify what level of falsified attestations will signal that the system needs to shut down either permanently or be restarted only after sufficient improvements are made.

Defer response to State Implementation Blueprint.

N/A. The state has chosen not to allow self-attestation for Home Efficiency Rebates. **[PENDING COMMISSION DECISION]**

28. Describe how the state program will verify applicant information provided to substantiate income eligibility, including systems that will be used to verify, where applicable, that at least one member of a household has been enrolled in a program included within the Federal Programs Approved for Categorical Eligibility document or other state-proposed approved by DOE within the prior 12 months.

The third-party vendor the state selects to oversee the income eligibility process will be required to review all of an applicant's documentation whether to substantiate income or verify enrollment in a qualifying program. They will be required to visually review all submitted information.

In addition to visual review of documentation, the state plans to integrate automation into the process where possible (e.g., use of screening technology to review standard information like 1040 forms, enrollment cards for specific programs) to confirm whether the information provided in the documentation meets requirements. Where needed, the implementer will contact agencies that administer programs approved for categorical eligibility to confirm a household member's enrollment.

29. If applicable, identify the federal or other programs by which the state plans to allow categorical eligibility.

N/A. The state will not propose additional federal or other programs to be considered for categorical eligibility.

30. If applicable, propose any additional federal or other programs to be considered for categorical eligibility. For any programs not already approved, describe how the program's eligibility aligns with the Home Efficiency Rebates income requirements.

N/A. The state will not propose additional federal or other programs to be considered for categorical eligibility.

Defer response to State Implementation Blueprint.

31. Identify whether the state requests authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period (e.g., proof of enrollment within the past 12 months).

Yes, the state requests authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period.

N/A. The state does not request authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period.

If yes, explain the state's proposal and describe the rationale.

Defer response to State Implementation Blueprint.

[PENDING COMMISSION DECISION] For retroactive rebate applications the state will allow applicants to provide proof of enrollment in a qualifying program at any point between August 16, 2022 and the date of official program launch.

To accommodate instances where previous year documentation is not available, the State proposes to allow eligibility to be determined using documentation dated within the preceding 24 months of the project being completed. The State recognizes that some low-income programs do not update their enrollment information annually; and some households (given relocations or other factors) may not have up-to-date enrollment documentation. Therefore, the state proposes to accept documentation that demonstrates a household's enrollment within this longer period of time.

32. Identify whether the state requests authorization to allow categorical eligibility for a program in a way that is not consistent with the "level of categorical eligibility" listed in the document Federal Programs Approved for Categorical Eligibility. For each deviation requested, propose, and provide documentation to justify the requested change.

Documentation must demonstrate that the state imposes income requirements equivalent to or less than 80% AMI.

Defer response to State Implementation Blueprint.

N/A. The state will not allow categorical eligibility for a program in a way that is not consistent with the “level of categorical eligibility” listed in the document Federal Programs Approved for Categorical Eligibility.

33. Provide a brief description of the procedures and penalties the state will provide to ensure that renters are not subject to unjustified rent increases.

The Public Service Commission has established processes to refer items to different state agencies depending on the issue. For payment default issues, the Commission can refer items to the Wisconsin Department of Justice (DOJ) and in the past has worked with the Wisconsin Department of Revenue (DOR) when an individual or entity has defaulted on a loan and entered into a collection’s agreement. For consumer protections issues, such as business misrepresentation or fraud, the Commission can refer these matters to the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP). Consumers can also file a complaint directly with DATCP. The Commission also has an internal complaint process under Wis. Admin. Code chs. PSC 113 and 134 for consumers to file complaints and request a formal review process.

For all tenant-occupied properties that receive higher rebate amounts available only to households with incomes less than 80% AMI, the state will require the building owner to sign a statement acknowledging the following:

- The owner agrees to rent the dwelling unit to a low-income tenant.
- The owner agrees not to evict a tenant to obtain higher rent tenants based upon the improvements.
- The owner agrees not to increase the rent of any tenant of the building as a result of the energy improvements with exception of increases to recover actual increases in property taxes and/or specified operating expenses and maintenance costs.
- The owner agrees that if the property is sold within 2 years of receipt of the rebates, the aforementioned conditions apply to the new owner and must be part of the purchase agreement.
- In the event the owner does not comply, the owner must refund the rebate.
- The owner will provide written notice to tenants explaining their rights and the building owner’s obligations (e.g., add an addendum to the lease).

- The owner will be subject to penalties commensurate to their actions with a minimum penalty of [TBD].

The state will provide contact information for tenants to notify the state of breaches to this agreement. The state will also include this information in the consumer education campaign, so tenants are aware of their rights under the applicable state law.

34. Explain how the state will identify eligible contractors or aggregators and what tools will be used to pay the \$200 disadvantaged community incentive.

The state will use the [DOE Rebate Tracking System](#) and will use the Climate and Economic Justice Screening Tool (CEJST) maps to identify disadvantaged communities.

When a rebate coupon is issued via the DOE system, that unique coupon will state whether a contractor may be eligible for a portion of the \$200 incentive based on the location of the home. At the same time that the state issues the rebate coupon to be applied to the energy upgrade project, the state will reserve an additional \$200 to be shared by, and paid to, contractor(s) when they submit the required information about the completed project. The state will also provide educational materials and do outreach to contractors so that they are aware of this potential incentive.

Section 3.1.4: Community Benefits Plan

35. Describe how the state program will define a disadvantaged community.

If not using the default disadvantaged community definition (low-income households located in a disadvantaged community identified by the Climate and Economic Justice Screening Tool (CEJST), a state must explain how the proposed definition will meet the following three criteria as described in DOE J40 implementation guidance⁴:

- a. The communities of concern identified by the state tool or definition must conform to the definition of communities established in U.S. Office of Management and Budget (OMB) guidance:
 - i. a group of individuals living in geographic proximity to one another that experiences common conditions.
 - ii. a geographically dispersed set of individuals (such as migrant workers or Native Americans) that experiences common conditions.
- b. The state tool or definition must consider two or more of the following indicators when identifying communities that should be classified as disadvantaged for the purposes of directing federal investments under Justice40:

- i. Low income, high and/or persistent poverty
 - ii. High unemployment and underemployment
 - iii. Racial and ethnic residential segregation, particularly where the segregation stems from discrimination by government entities
 - iv. Linguistic isolation
 - v. High housing cost burden and substandard housing
 - vi. Distressed neighborhoods
 - vii. High transportation cost burden and/or low transportation access
 - viii. Disproportionate environmental stressor burden and high cumulative impacts
 - ix. Limited water and sanitation access and affordability
 - x. Disproportionate impacts from climate change
 - xi. High energy cost burden and low energy access
 - xii. Jobs lost through the energy transition
 - xiii. Access to healthcare
- c. The communities of concern identified by the state tool or definition must be currently mapped in software or must be easily overlaid in GIS so that communities can be easily identified by stakeholders.

[PENDING COMMISSION DECISION] The state will use the DOE-provided definition of disadvantaged communities and use the federally-issued CEJST to identify disadvantaged communities (available here: <https://screeningtool.geoplatform.gov/en/%233/33.47/-97.5>)

Section 3.1.5: Processing and Delivering Rebate Funds to Eligible Rebate Recipients

36. Describe what types of systems will be put into place to allow effective processing of rebates.

The implementation contractor will be charged with establishing an electronic rebate processing system. The state's rebate processing system will have protocols in place to ensure that rebates are issued within 4 weeks (28 days), as required, of receipt of an eligible rebate application to the implementation contractor.

The implementation contractor will be required to use the [DOE Rebate Tracking System](#) to ensure effective issuance of rebates, eliminate or dramatically reduce the possibility of duplicating rebates, and allow effective flow of information to the users as well as to our state, our implementer and DOE. The state will expedite

rebate initiation and processing through the use of electronic systems and standard data specifications including but not limited to HPXML.

In addition to the rebate processing functionality, the program will include a user-centered interface that can easily be used by all types of entities participating in the rebate programs (e.g., household, landlord, contractor) to carry out the different steps of the rebate process (e.g., rebate application, data input, reimbursement request).

As a complement to the IT system, the state will provide a hotline to assist all customers, particularly those with limited access to internet-based systems. The state will have outreach (web-based as well as other forms) to ensure that building owners, contractors, vendors, distributors, manufacturers, and others have up-to-date information.

Along with the issuance of a rebate coupon (regardless of who initiates the process), the state will provide information to all affected parties (i.e., contractor, homeowner at a minimum, and others where relevant) that communicates limitations of the rebates, how they can be correctly applied, and how rebate processing works to reimburse contractors/aggregators for rebates applied at time of sale.

37. Describe how the state will ensure processing of rebates within required timeframes (e.g., through a processing company, through program implementers, or other entities or methods). Include information on corrective actions that the state will implement in the event of lengthier processing times.

The state will use an implementation contractor to carry out rebate processing. The state will require rebate processing to occur no more than 4 weeks from receipt of required and acceptable.

Our implementation contractor will be required to submit a rebate processing process flow that demonstrates how they will ensure the rebate requirements are completed within the required timelines. The implementation contractor will be required to demonstrate staff training on the protocols and offer a helpline for technical support.

Our program guidelines and onboarding process will include information on the process and requirements associated with submitting and accessing rebates on

behalf of consumers. The state will establish clear benchmarks and performance metrics and monitor performance.

The state will require our implementation contractor to report processing times [monthly]. Should the processing times exceed those stipulated above, the state will require the implementation contractor to provide an explanation as well as propose and implement new methods or systems to speed up processing within 30 days of notification. Our contract with the implementation contractor will include the option for the state to impose financial penalties on the processor if processing times are not remedied in an acceptable period. Should the state find that processing (for specific reasons) cannot be completed within 60 days, the state will contact our DOE project officer to determine an appropriate process moving forward.

38. Describe how the proposed processing system will be integrated with a system for processing rebates under Section 50122. Note if the state plans to use separate systems.

The state will apply the DOE/PNNL provided workflows and use the [DOE Rebate Tracking System](#) to provide a seamless and integrated approach to both types of rebates.

39. If the state does NOT intend to use a federally provided web-based tool to determine whether a home is in a disadvantaged community, confirm that the state will provide the ZIP codes with all disadvantaged communities as defined by the state to the DOE system.

- Yes, the state confirms the above statement.
- N/A. The state will use a DOE-provided web-based tool to determine whether a home is in a disadvantaged community.

40. Confirm that the state system will link to DOE-provided systems via Application Programming Interface (API).

- Yes, the state confirms the above statement.

Section 3.1.6: Data Collection and Evaluation

41. Confirm that the state will submit a Privacy and Security Risk Assessment in the State Implementation Blueprint.

- Yes, the state confirms the above statement and will include it with this narrative document.
- Yes, the state confirms the above statement but defers a response to State Implementation Blueprint.

The completed Privacy and Security Risk Assessment will be submitted at least two weeks prior to program launch.

42. Explain how data will be protected, specifically addressing security measures and privacy measures.

- Defer response to State Implementation Blueprint.

The State of Wisconsin will set minimum standards to ensure the safety and privacy of the consumer data and documents collected to administer and implement the HOMES program. The State will also establish cyber security provisions to be included in contracts for all partnering entities that will have access to and/or provide the HOMES data systems. Data collected by the State of Wisconsin in administering the programs may not be sold. Data collected by Wisconsin in administering the programs may be shared with Program Implementers and/or Evaluators with whom the State has a contractual relationship, and prohibitions against data selling and data sharing will be included in the contracts with those entities. For all other entities, collected data may not be shared with others except with the explicit written permission of DOE.

All Privacy and Security Risk assessments for the HOMES program will be developed using the State of Wisconsin's minimum baseline controls for Privacy and Security Risk Assessments. The State of Wisconsin will adhere to all policies and standards set by the Wisconsin Division of Enterprise Technology for information systems and environments used in the delivery of the HOMES program.

Each program partner will implement and maintain an Information Security Program, designating one or more employees to maintain it. The Information Security Program shall include, but not be limited to encryption, redaction, secure user authentication protocols, up to date firewall protection, physical safeguards, training, prohibition on saving Confidential Information on thumb drives, and any other necessary controls.

43. Provide documentation of the processes to monitor, identify, and address security and privacy threats.

- Defer response to State Implementation Blueprint.

The State of Wisconsin will conduct a review of the HOMES program's processes to monitor, identify, and address security and privacy threats prior to launching the program and every three (3) years thereafter, or more frequently if warranted.

All individuals accessing the system(s) and program data will complete required trainings and have access to documentation that describe their responsibilities and expected behavior for information and system usage, security and privacy. A signed acknowledgement must be received prior to authorizing access to confidential information and the system(s).

The State of Wisconsin is expecting to use SPECTRUM, a CRM-based data management system, as the reporting and rebate payment system for HOMES. SPECTRUM is a custom-built Microsoft Dynamics 365 platform for Focus on Energy, Wisconsin's statewide energy efficiency and renewable energy program. In addition to the inherited security features of Microsoft, such as data encryption in transit and at rest, the State of Wisconsin has implemented additional security controls to protect against unauthorized access to the systems and program data. Risky sign-in alerts are received and reviewed by the IT Systems Manager overseeing the HEAR program. Alerts with a high-risk level require the user to reset their password and verify their identity through MFA and email. Notifications with low and medium risk require users to verify their identity through MFA. Security control examples for users with access to SPECTRUM include:

- Unique logins.
- Multi-factor authentication.
- Defined and limited data access by role and specific use-case.

Program partners will report any suspected cyber security or privacy incident to the IT Systems Manager at the State overseeing the HOMES program within 24 hours of becoming aware of the occurrence. The State of Wisconsin will investigate the reasons for, and circumstances surrounding the Incident and take necessary actions to prevent, contain, and mitigate the impact of the Incident. Evidence concerning the Incident will be collected and preserved, including documentation regarding incident response and remedial actions taken. The State of Wisconsin will be responsible for reporting and communicating any confirmed data breaches to the public.

44. Confirm that the state will require billing data release and describe how the state will gain access to billing data for program requirements and program evaluation.

- Yes, the state confirms the above statement.
- Defer response to State Implementation Blueprint.

[PENDING COMMISSION DECISION]

The state will partner and work with utilities in the state to ensure DOE will have access to billing/usage data when requested. The utilities may elect to sign an agreement confirming their participation and additional details regarding data access coordination. These agreements will be submitted to DOE.

For all projects that apply for a 50121 Home Efficiency rebate, the state will require the homeowner to provide 12 months of prior billing data. This can be done by submitting that data to their assessor who will then provide this data to the state through the online portal. The homeowner must sign a statement that they provide access to 12 months of all energy utility billing data prior to the upgrade as well as 12 months of all energy utility billing data after the upgrade for evaluation purposes. The homeowner must provide written consent of releasing their billing data when qualifying for income in the online portal.

Please refer to the Utility Data Access Plan Implementation Blueprint for details regarding how the state will coordinate with utilities to gain access to billing data for program requirements and program evaluation.

45. Confirm that the state will collect the required data and cooperate in program evaluation processes as listed in Section 3.1.6.3 of the Program Requirements & Application Instructions document.

- Yes, the state confirms the above statement.

46. Confirm if the state is planning to conduct its own evaluation, and if so, what type(s) of evaluations.

- Yes, the state confirms the above statement. (Describe types of evaluations)

The state plans to conduct the following third-party led evaluations:

- Process evaluation to evaluate the program experience for program participants, consumers, contractors, distributors, vendors.
- Process evaluations to understand success and recommendations for improvements towards program priority areas (e.g., disadvantaged communities, multifamily, regionally focused programs)
- Impact evaluation to measure program impacts (e.g., consumer bills, fuel types, energy savings)

If yes, confirm that the state will:

a. Cooperate with DOE to meet all the requirements listed in Section 3.1.6.3 of the Program Requirements & Application Instructions document.

Yes, the state confirms the above statement.

b. Submit an evaluation plan for DOE review within three months of program launch.

Yes, the state confirms the above statement.

c. Provide results to DOE.

Yes, the state confirms the above statement.

47. If the state plans to conduct evaluations on its programs, describe the evaluation objectives, high level work plan, and timing of the evaluations and whether the state would request to be excluded from DOE-led evaluations.

Defer response to State Implementation Blueprint.

N/A. The state does not plan to conduct its own evaluation.

- The state will establish our evaluation objectives as part of developing our evaluation plan. Potential objectives include but are not limited to (a) understanding program experience of different stakeholders to improve process (b) quantifying impacts on bill savings, GHG, and/or non-energy benefits and developing recommendations for increasing beneficial outcomes; (c) measuring lasting changes in behavior and decision-making of consumers and suppliers.
- As a first step, the state will identify what types of impacts/outcomes the state wants to measure.

- Evaluations will be designed to help us assess progress toward meeting our program’s goals and to help us make process and other improvements over the course of the rebate program.
- Evaluations will be designed to complement national reviews as well as other components of our program design and implementation (e.g., quality assurance).
- The state will identify what data needs to be collected as part of our implementation processes (e.g., data on improvements, costs) and what data will be collected as part of evaluations (e.g., focus group responses). The state will ensure that relevant data collection is integrated into our implementation processes.

The state will develop a work plan that describes anticipated research strategies, evaluation methods, as well as the size and timing of our evaluations.

CONSUMER EXPERIENCE

Section 3.2.1: Outreach and Education Strategy

48. Confirm that the state will develop and submit an outreach and education strategy consistent with Section 3.2.1.

- Yes, the state confirms the above statement and will include it with this narrative document.
- Yes, the state confirms the above statement but defers a response to State Implementation Blueprint.

The foundation for a positive consumer experience lies in effective outreach and education regarding the benefits of the IRA Home Energy Rebate programs. Focus on Energy (Focus) was chosen to administer the Wisconsin program because of the structure already in place to reach most of Wisconsin’s residential customers. Focus on Energy has a successful communication platform already in place, i.e. website, newsletters, support channels, etc. Focus is also able to start with an engaged group of contractors, partners, and potential participants and will be able to share information on rebates that can be stacked on top of the Home Energy Rebates for participants. This may include additional rebates or services through the Department of Administration’s Division of

Energy, Housing and Community Resources (DEHCR) Home Energy Plus program, Focus on Energy, tax credits and other utility incentive programs.

Focus on Energy will utilize outreach efforts to cross promote both the Home Efficiency Rebates (HOMES) and Home Electrification and Appliance Rebates (HEAR) programs as much as possible and where appropriate, depending on the communication tactic and message.

Section 3.2.2: Home Assessments

49. Describe the processes and procedures for conducting home assessments that meet program requirements.

Overall Requirements

As part of our program guidelines and written into our contractor participation agreements, the state will require every home to receive an assessment that meets DOE requirements. These assessments, when done on single-family homes, must also be in accordance with BPI 1100/1200 home assessment standards. Additional information will be posted prior to launch of this program, including requirements for what information must be provided to the state and/or homeowner or building owner (e.g., a scope of work, cost and expected energy and cost savings).

To ensure effective assessments meeting the state's requirements, the state and/or its implementer(s) will provide onboarding and training to participating contractors. Participating contractors will receive home assessment checklists that list the minimum data collection requirements.

Specific home assessment requirements for each building type and each project approach are described below.

Modeled Approach: Single-family

The home assessment protocol for single family modeled and measured energy-savings projects will adhere to requirements of BPI 1100/1200 home assessment standards. All assessments will feed data into modeling software approved by DOE.

Modeled Approach: Multifamily

Contractors will be required to complete a ASHRAE Standard Level 2 audit and run an energy model through software approved by DOE. The ASHRAE L2 audit

data need to be reported in BuildingSync schema format. Energy modeling will be used to analyze the proposed retrofits and estimate the cumulative energy savings of the recommended measures.

50. Describe how home assessment data and results will be verified for accuracy.

Assessment accuracy starts with training which will be required of all participating contractors, as referenced in the previous question.

Our program's Quality Assurance (QA) and Quality Control (QC) protocols will include the following elements to assess accuracy:

- Approved assessment and data collection tools will be required to include data validation checks and constraints to minimize data entry mistakes. These basic checks will be on both the input and the output side.
- Every project will include a desk review by our implementer.
- The state will conduct third party on-site QC on the first assessment completed by each newly onboarded assessor.
- On an annual basis, the state will randomly sample the lesser of (a) a statistically significant sample or (b) [5%] of all completed jobs for on-site follow-up and verification of installed equipment and the assessment data, as feasible.
- Through automated data analytics (if resources allow) or more manual review, the state will compare data submitted across contractors and aggregators to detect outliers and potential problems with assessments. At a minimum, this will be conducted no later than one year after program launch.
- Should some contractors/aggregators appear to consistently report extremely poor baselines inconsistent with the targeted housing stock, the state or its implementer will follow-up with calls to the households served by these contractors to better understand the households' perspectives of the work performed and outcomes.
- Contractors who are flagged due to data collection anomalies or concerns (where found in no more than 25% of their projects) will be required to take additional training on conducting assessments and/or shadow other contractors to learn best practices.

51. Describe what processes will be put in place for home assessments for multifamily buildings, including for energy used by common areas.

All multifamily-applicable information provided in response to question #49 applies to this question. Additional information is provided here:

The state will require standard use assumptions for common areas unless the modeler provides rationale for applying other assumptions. Pre- and post-diagnostics will be required as needed depending on the improvement measures that will be implemented.

Section 3.2.3: Access to Residential Utility Data

52. Confirm that the state will develop and submit a Utility Data Access Plan consistent with the program requirements in Section 3.2.3 in the Program Requirements & Application Instructions document.

- Yes, the state confirms the above statement and will include the plan with this narrative document.
- Yes, the state confirms the above statement but defers a response to State Implementation Blueprint.

Section 3.2.4: Project-Specific Energy Savings Calculations

53. Confirm if the state will implement the modeled path, measured path, or both.

- The state will implement the Modeled program path.
- The state will implement the Measured program path.
- The state will implement both the Modeled and Measured program paths.

The state will plan to include a Measured program path in 2025.

Section 3.2.4.1: Calculating Modeled Energy Savings

54. Identify what factors the state will use to calculate kWh equivalent, consistent with Section 3.2.4.1.

The state will apply standard conversion factors to calculate kWh equivalents as noted in the following chart:

Fuel	Measured Energy Rate	Convert to kWh
Natural Gas	therm	kWh = therm * 29.3
Propane	gallon	kWh = gallons * 26.8

Fuel Oil	gallon	kWh = gallons * 43.9
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55. Describe the energy savings objectives and overall approach for estimating energy savings for the modeled program path (if applicable).

Objectives:

- The program will target rebates to customers where up-front costs have been barriers to participating in Focus on Energy or other utility programs. The program will also target customers with high energy burden and service territories that depend on delivered fuels.
- Electrification projects should result in reduced household energy bills.

First, the state wants building owners to get good advice regarding the types of improvements that make sense for their homes, including how different measures will affect utility bills, comfort, indoor air quality, and moisture. To that end, the state will require contractors to model energy savings attributable to envelope improvements for homes with existing conditions that are less efficient than state-established envelope efficiency minimums (e.g., insulation R values). Second, the state wants the modeled energy estimates to be in line with the actual energy savings realized after the improvements are made. Given that the energy model predicts energy savings (which can then be translated into cost savings predictions based on local fuel rates), the state will require contractors to include their underlying assumptions regarding occupancy and occupant behavior (e.g., set points). The state may also require them to run their models using standardized assumptions that the state will provide.

The state will require contractors to confirm that their estimated range of energy savings and utility bill impacts for their proposed scope of work are in the line with the estimates provided in the energy model. This information must be provided to residents or building owners prior to beginning the work, and customers must acknowledge in writing that they were provided this information.

56. Identify which upgrades may be included in the modeled savings estimate, including at least one major upgrade as defined in Section 2.1 of the Program Requirements & Application Instructions document, including a brief description of if the state will or will not require the installation of envelope prior to other upgrades (if applicable).

Our state will allow only inclusion of upgrades consistent with BPI-2400 for the purposes of modeling energy savings. The state may further restrict eligible upgrades pending consultation with experts and implementation contractor(s).

The state will require all contractors to propose envelope improvements (air sealing, duct sealing, window attachments, insulation) to residents or building owners when a home's baseline envelope conditions are insufficient. Prior to launching the program, the state will work with its implementation contractor, and other experts as needed, to establish these pre-condition thresholds (e.g., attic insulation must have at least a certain R value). The state recognizes that some residents or building owners may not wish to expend resources on certain improvements; however, the state will require contractors to run at least one comparative model that includes envelope improvements in order to demonstrate how different options are likely to affect energy use and utility bills. The state will also require contractors to provide standard information regarding how a home's conditions interrelate and how envelope can affect comfort, moisture, etc.

57. Identify which modeling tools the state proposes to authorize for its program. Identify whether any proposed tools have not yet received DOE approval.

The state has not yet confirmed what modeling tool(s) will be allowed and is waiting on DOE to provide a list of approved software. The state will provide a list no later than 60 days prior to program launch, consistent with the deadline for State Implementation Blueprint to allow for DOE review and obtain approval.

58. Describe how the state will monitor the energy savings reliability of models and tools for the modeled program path.

As noted in response to question #49, the State will require contractors to use DOE-approved modeling tools.

State Review

Modeled vs. Actual Usage Analyses: Upon completion of the first year of the program, and at least annually thereafter, the state or its implementor will randomly select homes (single-family and multifamily) that have received improvements and assess how their actual (measured) savings compare with the predicted savings (whether through modeled or measured). The state is instituting agreements with our state's utilities to ensure that the state can collect this data in a seamless manner for the purposes of evaluation. As part of our evaluation plan, the state will propose the scope of this analysis, but as a first cut, the state expects to randomly select a representative sample of projects. The state may select a larger percentage initially and then reduce the percentage over time depending on the results of this analysis.

If resources allow, the state will do one or more of the following:

- The state will conduct standard analytics on pre and post data to look for trends in reliability by type of software, contractors, housing type, fuel type, etc. The state will establish a feedback loop to our implementer to use findings to inform corrections, modifications, and improvements as appropriate.
- Once the measured path is active, the state will work with our implementers to run modeled-path savings estimates (that is, conduct full assessments and calibrate the homes to their historical energy usage consistent with BPI 2400) for a set of homes going through the measured path. The state will, by definition, already be collecting post-retrofit energy consumption in these homes and can evaluate how reliable the modeled savings were in these measured path homes.

59. If the state plans to allow modeling for homes for which BPI-2400 is not applicable or that are not eligible for BPI-2400, request alternative modeled path(s) by:

- a. Detailing for which exceptions the state plans to apply the alternative approach (e.g., multifamily, lack of delivered fuel bills, etc.).
- b. Providing a detailed description of the method(s) that the state will use to estimate energy savings for each exception and how the state will ensure consistency between the alternative method and the results of BPI-2400 such as a realization rate adjustment to be used in reported savings estimates.
- c. Commit to carrying out evaluations upon thresholds listed in Section 3.2.3.1 of the Program Requirements & Application Instructions document.
- d. Describe how the state will use any evaluation results or new information to update and adjust its alternate savings modeling method.

Defer response to State Implementation Blueprint.

N/A. The state will not allow modeling for homes for which BPI-2400 is not applicable or that are not eligible for BPI-2400.

Consistent with the DOE program requirements and BPI-2400, the state will require contractors to calibrate their models to historical energy consumption data. There are a few instances in which our program will not require calibration, including the following types of circumstances:

- Multifamily buildings;
- Homes with delivered fuels and the renter/homeowner attests they cannot locate recent bills; and
- Where occupants have lived in the home less than one year.

Scopes of work generated in cases with non-calibrated models will receive more thorough desk review to ensure reasonable estimated savings.

Given that BPI-2400 does not cover multifamily buildings, the state will not require calibration but instead encourage contractors to do so as part of ASHRAE Standard Level 2 audits performed when using the modeled approach and a DOE-approved modeling software. As part of quality assurance described in other application responses, once the measured path is active the state will compare results from measured savings projects with those from modeled savings projects based on pre- and post-usage data where available for modeled savings projects.

For single-family and multifamily projects that use an alternative modeling approach, the state commits to conducting evaluations based upon the thresholds listed in Section 3.2.4.1 for these exceptions. The state will conduct its first evaluation of a representative sample of sites upon (whichever comes first):

- At least 200 projects have been completed; OR
- 10% annually, or 20% cumulative, of the program-to-date modeled funds have been provided for projects using an exception.

Depending on the results, the state may require additional program evaluations not more than once every two (2) years thereafter.

Following the first evaluation, our implementers will adjust program guidelines based upon the evaluator's findings to ensure the any non-calibrated energy savings estimates are at least as reliable as those including calibration.

If our state, based on discussions with our implementer and evaluator, concludes that it cannot expect reliable results without energy bill calibrated models, then the state will work with subject matter experts (e.g., national laboratories) to provide another approach to address these circumstances.

60. For multifamily, describe the methods used for modeling energy savings for multifamily buildings, including energy used in common areas.

- Defer response to State Implementation Blueprint.
- N/A. The state is not implementing the modeled program path.

The state will apply similar energy modeling requirements to multifamily buildings. All contractors will be required to use a DOE-approved energy modeling tool.

Contractors will be required to collect data consistent with the Building Audit Template created by DOE's Building Technologies Office and used by cities nationwide. The state will require a minimum set of inputs to the baseline and proposed retrofit models. The state will require standard use assumptions for common areas unless the modeler provides rationale for applying other assumptions. Pre- and post-diagnostics will be required as needed depending on the improvement measures that will be implemented.

Section 3.2.4.2: Calculating Measured Energy Savings

61. Describe the energy savings objectives and overall approach for estimating and measuring energy savings at the home and if applicable, portfolio of homes.

- N/A. The state is not implementing the measured program path.

62. Identify what factors the state will use to calculate kWh equivalent, consistent with Section 3.2.4.1.

- Defer response to State Implementation Blueprint.
- N/A. The state is not implementing the measured program path.

63. List the open-source advanced M&V software(s) the state requests to use and confirm that each meets program requirements.

- Defer response to State Implementation Blueprint.
- N/A. The state is not implementing the measured program path.

64. Describe how the state will monitor and ensure that aggregator portfolios meet the program requirements and minimum savings thresholds for the measured program path.

- Defer response to State Implementation Blueprint.
- N/A. The state is not implementing the measured program path.

65. If measuring energy savings within a period of less than 12 months, describe how the state will define and enforce the inclusion of peak seasons.

- Defer response to State Implementation Blueprint.
- N/A. The state is not implementing the measured program path.

66. Describe the state's processes for measuring savings for multifamily buildings, including for energy used by common areas.

- Defer response to State Implementation Blueprint.
- N/A. The state is not implementing the measured program path.

Section 3.2.5: Consumer Protection through Quality Assurance

67. Certify that the state will prepare and implement a Consumer Protection Plan in accordance with the requirements (Section 3.2.5) and that the state rebate program will not launch until receiving DOE approval.

- Yes, the state confirms the above statement.

Section 3.2.6: Post-Installation Certificate

68. Describe how each of the certification requirements (Section 3.2.6 of the Program Requirements and Application Instructions document) will be met for single-family homes.

The state will design a certification template which will include, at a minimum:

- A list of all work performed including details of installed equipment and materials
- Projected energy savings to support the accurate valuation of the upgrade

The certificate or a cover page accompanying it will include the DOE logo (per DOE usage guidelines) and recognition that the work performed was funded in part (or in full) through Home Energy Rebates provided under the Inflation Reduction Act of 2022. The state will provide a mock-up of these materials to DOE for review prior to launch. [THE FULL PROCESS FOR USING AND REQUESTING PERMISSION TO USE THE DOE LOGO, SEAL OR WORK MARK BY A NON-DOE ENTITY CAN BE FOUND HERE: [DOE LOGO, SEAL AND WORD MARK | DEPARTMENT OF ENERGY](#)]

Because our program implementer is not the contractor and is not compensated based on savings results, the state will rely on the implementer to serve as the qualified third-party certifier. Depending on our program delivery design, the state

and its implementer may elect to use other qualified entities or individuals (e.g., Community Action Agencies), unrelated to the contractor performing the work, to certify the project and issue the certificate to the household. The state's program guidelines will include clear instructions to certifiers on what they must confirm and verify with respect to each project and how to provide the certification to the household. It will also describe the minimum qualifications of certifiers.

69. Describe how each of the certification requirements (Section 3.2.5 of the Program Requirements and Application Instructions document) will be met for multifamily buildings.

As with single family projects, our implementer will design a template for the certification which will include, at a minimum:

- A list of all work performed including details of installed equipment and materials
- Projected energy savings to support the accurate valuation of the upgrade
- An ENERGY STAR Portfolio Manager score (when post-retrofit usage data is available).

The certificate or a cover page accompanying it will include the DOE logo (per DOE usage guidelines) and recognition that the work performed was funded in part (or in full) through Home Energy Rebates provided under the Inflation Reduction Act of 2022. The state will provide a mock-up of these materials to DOE for its review prior to launch.

Because our implementer is not the contractor and is not compensated based on savings results, our implementer will serve as the qualified third-party certifier.

Our program guidelines will include clear instructions to certifiers on what they must confirm and verify with respect to each multifamily project. To inform households within a multifamily building, the owner will be required to post (for no less than 6 months) the certificate in a public place within the multifamily building (e.g., entry, regularly used common space). They will also describe the minimum qualifications certifiers must have.

70. Identify which third-party certificate(s) the state program will offer to homeowners that receive a rebated home energy upgrade.

Consistent with our earlier response, the state will create a standard design template and specifications regarding the required content on the certificate and

accompanying materials. If the state identifies existing certificates used by other efficiency programs and providers, the state may allow alternative certificate designs that adhere to our specifications.

MAXIMIZING REBATE IMPACT

Section 3.3.1: Supporting the Clean Energy Economy Through Market Transformation

71. Certify that the state will prepare and implement a Market Transformation Plan within the first year after receiving the financial assistance award.

- Yes, the state confirms the above statement and will provide the plan within the first year after receiving the financial assistance award.

Section 3.3.2: Integrating with Other Programs

72. Identify whether the state plans to take proactive steps to encourage integration with other programs. If so, identify with which programs the state will actively seek to integrate. The state may include letters of support or other indicators of commitment from existing program partners. Applications should identify whether programs will be integrated in any or the following areas:

- a. Integration into existing program administration, website, materials.
- b. Adoption of existing program standards, QA, workforce standards, or other practices.
- c. Braiding or co-funding of upgrades within individual households.
- d. Other integration elements, as applicable.

- N/A. The state does not plan to integrate the rebates into any existing programs.

The state plans to integrate the Home Efficiency Rebates with the following program(s):

- Utility Programs: Focus on Energy, Commitment-to-Community, other voluntary utility programs – As one method for delivering these rebates, the state plans to leverage our utility programs. These non-federally funded programs already have qualified contractors delivering whole home retrofits and are therefore well suited to deliver the efficiency rebates as well.

- Weatherization Assistance Program (WAP) – To the extent feasible given restrictions in combining federal grants and rebates, as one portion of our rebates, the state plans to leverage our state- funded weatherization programs to deliver expanded whole-home energy efficiency services to low-income households in our state.
- Other state, municipal and non-profit efforts – to the extent possible, the state will attempt to work with other agencies, local governments, and community-based organization with additional funding or grants available to further stack funding.

By deeply integrating the Home Efficiency Rebates with Focus on Energy, the state will build on existing consumer education materials, quality assurance activities, and workforce qualifications. For example, Focus on Energy has well established quality assurance efforts which can be carried out in concert with the QA needed for ensuring effective use of the Home Efficiency Rebates. As another example, Focus on Energy has well established workforce standards that the state may adopt as either a minimum standard or one acceptable method for becoming a qualified contractor for the rebate program.

Regardless of whether the state can fully integrate home energy rebates into our existing programs, the state will be sure that any program co-funding or braiding comply with all DOE requirements including the Program Requirements & Application Instructions document.

73. Describe how the state program will support households, contractors, aggregators, and other stakeholders in understanding how the state program may leverage other program resources.

- Defer response to State Implementation Blueprint.

Focus on Energy has a successful communication platform already in place, i.e. website, newsletters, support channels, etc. Focus is also able to start with an engaged group of contractors, partners, and potential participants and will be able to share information on rebates that can be stacked on top of the Home Energy Rebates for participants. This may include additional rebates or services through the Department of Administration's Division of Energy, Housing and Community Resources (DEHCR) Home Energy Plus program, Focus on Energy, tax credits and other utility incentive programs.

Focus on Energy will utilize outreach efforts to cross promote both the Home Efficiency Rebates (HOMES) and Home Electrification and Appliance Rebates (HEAR) programs as much as possible and where appropriate, depending on the communication tactic and message.

74. Describe the method(s) the state will use to ensure the total combination of all immediate upfront funding sources (federal grants, federal loans, and non-federal funding) provided to a project does not exceed the total project cost.

- Defer response to State Implementation Blueprint.

The state will educate contractors (and consumers) regarding the restriction of applying incentives that exceed total project cost. All contractors on the qualified contractor list will be given a pre-launch set of materials including information regarding the restrictions on braiding and the restriction that total upfront incentives cannot exceed the total project cost. Contractors will also be required to take full advantage of any other funding opportunities (besides tax credits) before applying HOMES rebates.

When a homeowner or building owner initiates the process by requesting a rebate, they will be required to confirm that they understand the following:

A homeowner or building owner is not eligible for rebate funds that, in combination with other rebates or financial incentives, exceed the total project cost. A homeowner must inform their contractor of other incentives that they are receiving toward the cost of the project. The contractor will ensure these rebates are accounted for before any remaining costs are covered by this HOMES Rebate. The contractor must show that all rebates have been accounted for on their invoice, and a copy of the invoice must be signed by the homeowner.

The contractor will also require the homeowner or building owner to sign an affidavit stating that they did not receive funds in excess of the total project costs.

Finally, the state will require contractors to list all applied incentives on the invoice that must be sent to the state/implementer in order to receive reimbursement for the Home Efficiency Rebate applied at point of installation/service.

75. Describe how the state program will support contractors and retailers in preparing acceptable invoices that may be kept as program records.

- Defer response to State Implementation Blueprint.

The state will provide a sample invoice showing all prescribed components of the invoice. The sample invoice will be provided to contractors prior to program launch and will also be made available on the Program's website.

Contractors will be assigned an Energy Advisor who will provide training on invoicing and application submittal. Energy Advisors will be available to provide additional training for contractors, as needed.

Implementers will be required to review all submitted information from delivered projects prior to reimbursing contractors. The state intends to use the DOE workflows which include quality assurance and review steps as well as opportunities for contractors to submit any missing information should their documentation be initially rejected by the implementer.

In the event of an audit, the implementer or the state will be able to promptly provide all invoice documentation since it will be submitted electronically through the [DOE Rebate Tracking System](#) and submitted through a separate user interface for contractors that will upload the information manually. All of these records will be retained by the Program in its database of record, and the majority of this information will already be provided to DOE.

76. Describe how the state implementer(s) will produce invoice documentation in a timely manner upon request in the event of an audit by DOE, the DOE's Inspector General, a state's inspector general, or another entity.

- Defer response to State Implementation Blueprint.

The user interface developed for applying and processing rebates will allow contractors and aggregators to submit invoices as PDFs as well as through data entry of required information. The implementer will collect and retain all invoice data electronically. This information will also go directly to DOE via the API associated with the [DOE Rebate Tracking System](#) and can be used by DOE should audits arise. The state will also be able to readily export the invoice documentation to others that may initiate audits.

77. Describe how the state will ensure rebate recipients be made aware of the portion of the funding received from the DOE Home Efficiency Rebates.

- Defer response to State Implementation Blueprint.

The state will use the [DOE Rebate Tracking System](#) and workflows which include multiple notifications to all participants including homeowners and building owners regarding the level of DOE Home Efficiency Rebates available and applied.

Contractors will be required to provide a line item showing the level of rebate applied on invoices that must be signed by the homeowner or building owner. Without this documentation, contractors will not be reimbursed.

Section 3.3.3: Quick Starts

78. Identify whether the application is for a Quick Start program. For Quick Start programs, identify the timeline for program launch.

- Yes, this is for a Quick Start Program.
- No, this is not for a Quick Start Program.

APPENDIX

Home Efficiency Rebates

Measured and Modeled Rebate Levels

Table A-1. Modeled Savings Rebate Levels

Single-Family		
Modeled Energy Savings	Income Level	Rebate Amount
20%-34%	Less than 80% AMI*	Lesser of \$4,000 or 80% of project cost
	80% AMI and greater	Lesser of \$2,000 or 50% of project cost
35% or greater	Less than 80% AMI*	Lesser of \$8,000 or 80% of project cost
	80% AMI and greater	Lesser of \$4,000 or 50% of project cost
Multifamily		
Modeled Energy Savings	Income Level	Rebate Amount
20%-34%	A building with at least 50% of households with incomes less than 80% AMI*	Lesser of \$4,000 per dwelling unit or 80% of project cost
	A building with at least 50% of households with incomes 80% AMI and greater	\$2,000 per dwelling unit up to \$200,000 per building
35% or greater	A building with at least 50% of households with incomes less than 80% AMI *	Lesser of \$8,000 per dwelling unit or 80% of project cost
	A building with at least 50% of households with incomes 80% AMI and greater	\$4,000 per dwelling unit up to \$400,000 per building

*States may increase the maximum amount available for low-income households upon approval from DOE.¹ See Section 3.1.3 for details.

¹ 42 U.S.C. 18795(c)(3).

Table A-2. Measured Savings Rebate Levels

Single-Family		
Measured Energy Savings	Income Level	Rebate Amount
15% or greater	Less than 80% AMI	kWh, or kWh equivalent, payment rate equal to \$4,000 for a 20% reduction of energy use for the average home in the state or 80% of project cost*
	80% AMI and greater	kWh, or kWh equivalent, payment rate equal to \$2,000 for a 20% reduction of energy use for the average home in the state or 50% of project cost
Multifamily		
Measured Energy Savings	Income Level	Rebate Amount
15% or greater	A building with at least 50% of households with incomes less than 80% AMI	kWh, or kWh equivalent, payment rate equal to \$4,000 for a 20% reduction of energy use per dwelling for the average multifamily building in the state or 80% of project cost**
	A building with at least 50% of households with incomes 80% AMI and greater	kWh, or kWh equivalent, payment rate equal to \$2,000 for a 20% reduction of energy use per dwelling for the average multifamily building in the state or 50% of project cost

*Per statute, the measured energy saving of the home or portfolio of homes must achieve 15% savings, but the calculation of the rebate is based on a 20% reduction of average home energy use of a home in the state.

**States may increase the maximum amount available for low-income households upon approval from DOE.² See Section 3.1.3 for details.

² 42 U.S.C. 18795(c)(3).

Federal Programs Approved for Categorical Eligibility

Table A-3. Recognized Programs for Categorical Eligibility of Home Efficiency Rebates

Recognized Program	Eligible for Higher Level of Home Efficiency Rebates
Low Income Home Energy Assistance Program (LIHEAP)	X
Medicaid	X
Supplemental Nutrition Assistance Program (SNAP)	X
Head Start	X
Lifeline Support for Affordable Communications (Lifeline)	X
Food Distribution Program on Indian Reservations (FDPIR)	X
National School Lunch Program – Free (NSLP)	X
Housing Improvement Program (HIP)	X
Housing Opportunities for Persons with AIDS	X
Supplemental Security Income (SSI)	X
Weatherization Assistance Program (WAP)	Automatically eligible ONLY if household is located in an area where 80% AMI (Area Median Income) is greater than 200% Federal Poverty Level (FPL)
WIC	Automatically eligible ONLY if household is located in an area where 80% AMI is greater than 185% FPL.
Other (programs approved by DOE through state application process)	States may propose other income-verified programs for categorical eligibility in their applications. DOE will approve if those income criteria meet the Home Energy Rebates income criteria set forth in the Inflation Reduction Act.

Table A-4. Recognized Housing Programs for Categorical Eligibility of Home Efficiency Rebates

Recognized Program	Level of Categorical Eligibility for Rebates for Renters Receiving Housing Assistance	Whole Building Eligibility for Rebates
Public Housing (housing owned and operated by Public Housing Authorities)	Below 80% AMI	Single- and multi-family buildings owned and operated by Public Housing Authorities are fully eligible.
Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)	Below 80% AMI	If at least 50% of housing units are subsidized through these programs, then the multifamily building is fully eligible.
Privately-owned multifamily buildings that house residents receiving tenant-based assistance	Below 80% AMI	If at least 50% of building occupants receive tenant-based assistance, then the multifamily building is fully eligible.
Low Income Housing Tax Credit (LIHTC)	Below 80% AMI	If at least 50% of housing units are income-restricted, then the multifamily building is fully eligible.

Attachment 2

Community Benefits Plan

State of Wisconsin Home Energy Rebates Home Efficiency Rebate (HOMES) Program

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Purpose and Introduction

The Inflation Reduction Act (IRA) Home Efficiency Rebate Program in Wisconsin, heretofore referred to as the HOMES program, aims to encourage the adoption of energy saving measures in the state's existing housing stock to reduce residents' energy consumption, address challenges of energy affordability, and to promote sustainable practices.

The purpose of this document is to summarize the specific objectives the State of Wisconsin is committing to in its Community Benefits Plan (CBP). This will include defining the intended community benefits in quantifiable terms with SMART milestones – **S**pecific, **M**easurable, **A**chievable, **R**elevant, and **T**imely – and timelines wherever possible.

This CBP for the HOMES program, led by the State of Wisconsin and delivered by Focus on Energy, outlines the strategy and objectives for community and workforce engagement as well as diversity, equity, inclusion, and accessibility in alignment with the Justice40 Initiative. This CBP is also intended to document the benefits this program will provide to Wisconsin residents and workers that may have historically faced disproportionate barriers to accessing energy efficiency programs available in the state. The program is a next step in improving energy upgrades in homes across the state, with a focus on low-to-moderate income residents statewide, and residents living in Justice40 Disadvantaged Communities (DACs).

SMART Goals

Department of Energy (DOE) program guidance requires states to include at least one SMART milestone per calendar year to measure progress on proposed actions. The State of Wisconsin proposes the SMART milestones in the table below. The State of Wisconsin commits to making this Community Benefits Plan, the SMART milestones it establishes, and measured progress toward those milestones available to the public on the Focus on Energy website. Additional discussion of these SMART milestones is presented in subsequent sections of the CBP.

Year	Community and Labor Engagement	Investing in Job Quality and a Skilled Workforce	Diversity, Equity, Inclusion, and Accessibility	Justice40
2024	<ol style="list-style-type: none"> 1. Exploring one or more agreements (e.g. MOU) between PSC and DEHCR to align HOMES program and WAP. 2. Leverage existing Focus on Energy Trade Ally contractor network to recruit workforce of IRA Home Energy Rebates Registered Contractors. 	<ol style="list-style-type: none"> 1. Inventory areas of the state that currently do not have Focus on Energy contractors available to serve adjacent DACs. 2. Participate in 50123 TREC Workforce Advisory group meetings. 	<ol style="list-style-type: none"> 1. Inventory areas of the state currently underserved by efficiency programs. Use this data to find overlapping communities in Justice40 DACs to target outreach and engagement to. 2. Partner with at least 10 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and refer eligible households to participate. 	<ol style="list-style-type: none"> 1. Set program goal at least 40% of rebate spend occurs in Justice40 DACs. 2. Partner with at least 10 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and refer eligible households to participate.
2025	<ol style="list-style-type: none"> 1. Build or expand upon existing labor relationships with the labor organizations described in this 	<ol style="list-style-type: none"> 1. Leverage communication channels to reach past participants of HOMES program to notify them of 	<ol style="list-style-type: none"> 1. Partner with at least 5 community-based nonprofits located in Justice40 communities across the state to spread 	<ol style="list-style-type: none"> 1. Hold a Tribal Energy Symposium event on IRA Home Energy Rebate programs.

	<p>report. Establish annual meeting cadence.</p>	<p>potential job and training opportunities.</p> <p>2. Meet with Wisconsin Department of Workforce Development (DWD) on workforce needs resulting from IRA Home Energy Rebates.</p>	<p>awareness of the program and refer eligible households to participate.</p> <p>2. The State of Wisconsin commits to providing customers with information and tools to support a diverse choice of contractors from a variety of DEIA backgrounds, specified in more detail in this CBP.</p>	<p>2. Continue to engage with CBOs of 2024 efforts, at least biannually. Partner with an additional 5 CBOs located in DACs to expand partnerships and reach.</p>
2026	<p>1. Build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.</p>	<p>1. Identify DACs in the state that have had low participation in the IRA Home Energy Rebates due to contractor availability.</p> <p>2. Coordinate with the 50123 TREC effort to provide training in these areas of the state.</p>	<p>Recruit at least 10 new IRA Home Energy Rebates Registered Contractors with DEIA designations, defined later in this plan, by the end of the second year of the HOMES program.</p>	<p>1. Identify DACs in the state that have had low participation in the IRA Home Energy Rebates and partner with at least 5 CBOs located in this low-participation DACs to boost participation.</p> <p>2. Track status of low-income program participation to date in single-family and multifamily households as well as percentage of program spending on projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward [PENDING COMMISSION DECISION] % spend goal on low-income households and [PENDING</p>

				COMMISSION DECISION] % of project funds awarded toward projects located in Justice40 DACs.
2027	1. Build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.	1. Commits to partnering with at least 2 technical colleges in the state to encourage them to include rebate-eligible technologies into their curriculum during the implementation period of the HOMES program, to foster a future clean energy workforce pipeline.	1. Recruit at least 5 new IRA Home Energy Rebates Registered Contractors with DEIA designations.	1. Continue to engage with CBOs of 2024-2026 efforts, at least bi-annually. Partner with an additional 3 CBOs located in DACs to expand partnerships and reach. 2. Track status of low-income program participation to date in single-family and multifamily households as well as percentage of program spending on projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward [PENDING COMMISSION DECISION] % spend goal on low-income households and [PENDING COMMISSION DECISION] % of project funds awarded toward projects located in Justice40 DACs.
2028	1. Build or expand upon existing	1. As program funds are	1. Recruit at least 3 new IRA Home	1. Track status of low-income

	<p>labor relationships with the labor organizations described in this report. Establish annual meeting cadence.</p>	<p>nearing depletion, meet with Wisconsin Department of Workforce Development (DWD) on workforce needs resulting from IRA Home Energy Rebates, including how industry has changed and anticipated shifts as funding runs out.</p>	<p>Energy Rebates Registered Contractors with DEIA designations.</p>	<p>program participation to date in single-family and multifamily households as well as percentage of program spending on projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward [PENDING COMMISSION DECISION] % spend goal on low-income households and [PENDING COMMISSION DECISION] % of project funds awarded toward projects located in Justice40 DACs. Consider additional partnerships with CBOs based on results and rebate distribution throughout state.</p>
2029	<p>1. Build or expand upon existing labor relationships with the labor organizations described in this report. Establish</p>	<p>1. As program funds are nearing depletion, meet with Wisconsin Department of Workforce Development (DWD) on</p>	<p>1. Recruit at least 3 new IRA Home Energy Rebates Registered Contractors with DEIA designations.</p>	<p>1. Identify at least 3 CBOs located in DACs to develop scope for a clean energy workforce career pipeline program with.</p>

	annual meeting cadence.	workforce needs resulting from IRA Home Energy Rebates, including how industry has changed and anticipated shifts as funding runs out.		
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Given that this is a new, federal program to be launched in Wisconsin, some goals are difficult to be defined as specific *and* achievable until after one year of implementation. In the table above, the State of Wisconsin has put forth our best attempt to capture how the state will encourage and ensure that the HOMES program benefits communities – especially those that are low-income and in Justice40 disadvantaged communities. As part of achieving these goals, as well as the minimum requirements put forth by the Department of Energy, Wisconsin commits to tracking and reporting of metrics such as:

- Number of projects completed in Justice40 DACs.
- Number of projects completed in energy-burdened census tracts.
- Rebate spend on projects completed in Justice40 DACs.
- Rebate spend on projects completed in rural census tracts.
- Rebate spend on projects completed in energy-burdened census tracts.
- Estimated energy savings from projects completed in Justice40 DACs.
- Estimated energy savings from projects completed in energy-burdened census tracts.
- Customer satisfaction with program.
- Customer self-reported energy bill reduction impacts.

This tracking and reporting will be used to assess the program’s performance relative to the SMART goals outlined in the table above and may inform areas of program improvement to increase the likelihood that goals are achieved.

The remainder of this document will summarize the specific objectives the State of Wisconsin is committed to in the relevant section of this Community Benefits Plan, broken into specific commitments, engagements, tasks, and sub-tasks.

General Program Information

The HOMES program will provide rebates to Wisconsin residents performing qualified whole-home retrofit and improvement projects demonstrating the capability of delivering minimum levels of energy savings verified by tools/software meeting the State’s approved criteria. Participants will benefit financially through bill savings, as well as non-energy benefits such as potentially improved comfort, safety, and positive health outcomes as a result of improving their home. Projects will also contribute towards a reduction in greenhouse gas emissions. In alignment with the requirements of the Inflation Reduction Act and U.S. Department of Energy, Wisconsin will make this program available to residents of single family and multifamily buildings in the state living in **all households regardless of**

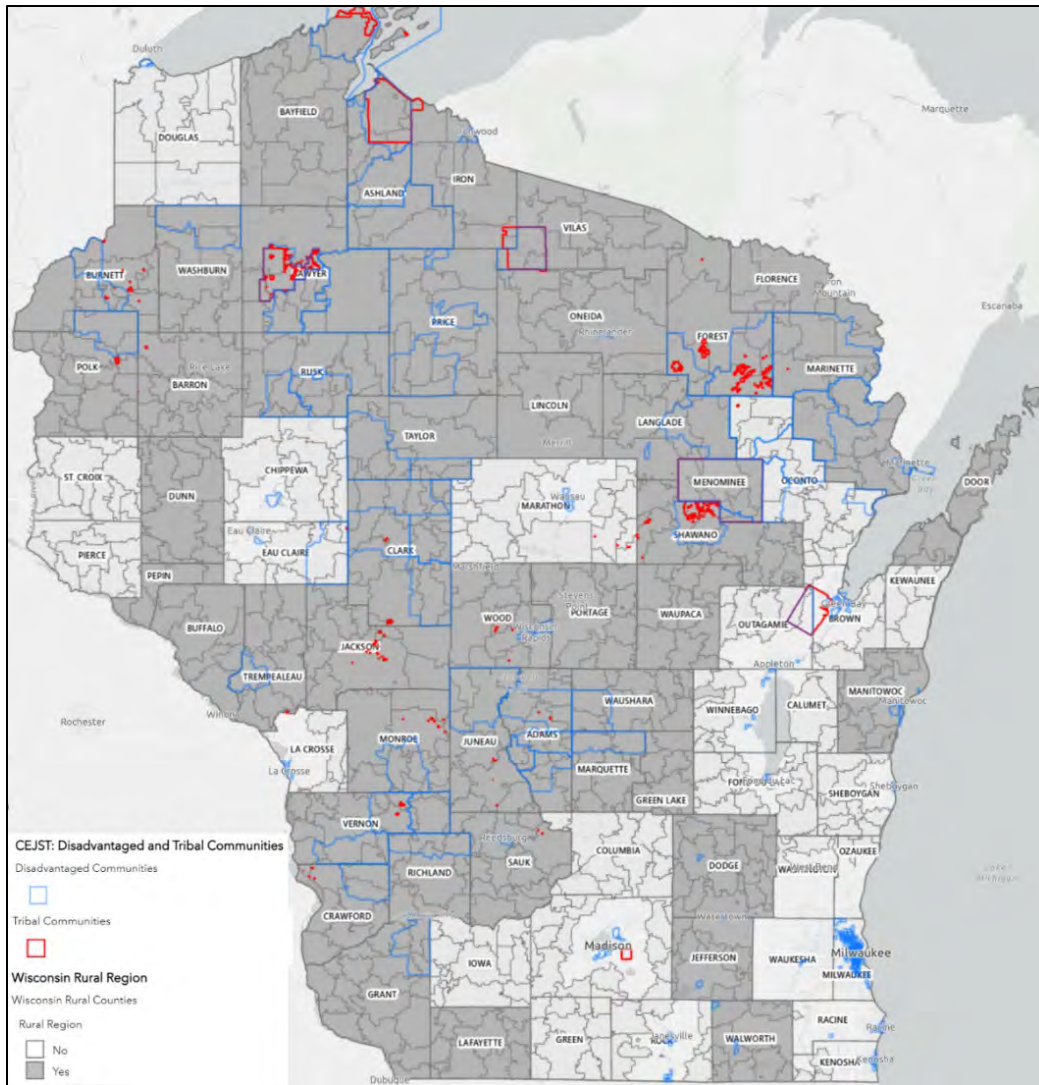
income/households at or below X% AMI – Pending Commission Decision]. Higher rebate levels will be made available to eligible low-income households to encourage adoption of energy saving measures for those residents of the state who have traditionally been underserved by whole-home energy projects due to high upfront costs. Additionally, the State of Wisconsin will offer incentives to Registered Contractors performing projects in Justice40 DACs to encourage greater access to program rebates to residents of these communities.

The State of Wisconsin's Public Service Commission (PSC) has established additional guiding principles to ensure the benefits of Wisconsin's HOMES program are distributed to underserved and disadvantaged communities in the State. The PSC has outlined the following strategic objectives and core principles for the design and delivery of these funds to advance equity and improve the lives of energy burdened households:

1. The program should leverage existing Focus on Energy infrastructure to maximize administrative efficiency and improve customer experience while maintaining appropriate separation, per Commission order.
2. The program will target rebates to customers where up-front costs have been barriers to participating in Focus on Energy and particularly, in areas of the state with high energy burden and service territories that depend on delivered fuels.
3. The rebate experience should be simple and clear for all participants (customers, contractors, distributors and retailers). Customer eligibility requirements, product and project requirements, and other processes should be well documented and easily understood.
4. Electrification projects should result in reduced household energy bills.
5. Program planning and implementation will be transparent and offer opportunities for stakeholder input and public comment.
6. Program design should support long-term workforce development opportunities and leverage contractor training grant funding where possible.

With these guiding principles in mind, as well as other federal funding opportunities occurring in Wisconsin, the PSC has created a webmap to display Justice40 DACs alongside rural zip codes and tribal communities, which are target underserved communities in the state. This webmap can be accessed from the PSC website.¹ A screenshot of the webmap is shown below.

¹ Public Service Commission Office of Energy Innovation. OEI Map. Accessed from: <https://maps.psc.wi.gov/portal/apps/webappviewer/index.html?id=cd2b3dc76d4d460da05d72c254123318>



The next sections of this CBP will focus on how the State of Wisconsin will ensure the HOMES program rebate funds benefit Wisconsinites – particularly those of in disadvantaged, rural, and underserved communities, as well as supporting details on how Wisconsin will meet our SMART goals and timelines.

Engage Community and Labor

Wisconsin performed a robust effort to engage with residents, community partners, local and Tribal governments, and the state’s workforce and labor organizations to educate stakeholders on the programs and gather their input on key program design considerations. The program is committed to engaging with underserved communities, including DACs, in the program planning, design, implementation, and evaluation processes.

The Wisconsin HOMES program will be delivered through Focus on Energy (Focus), Wisconsin’s statewide energy efficiency and renewable resource program funded by utility customers. Delivery of HOMES program will build upon the community and workforce relationships cultivated by Focus over more than two decades of delivering efficiency programming to Wisconsin residents and communities. The State of Wisconsin also recognizes that the Focus program has not been able to serve all residents

of the state equally in those two decades— whether due to utility participation, heating fuel source, customers’ ability to pay for the upfront costs of energy efficiency, awareness of the program, or other factors. For these reasons, the State of Wisconsin views the HOMES program as an opportunity to serve those that have historically been unable to participate in existing efficiency programs as well as those that could benefit most from energy savings (i.e., those with high energy burdens).

The State of Wisconsin and Focus have been engaging communities, including local governments, Tribal governments, and community-based organizations located in and serving DACs, in several ways over the last couple years to improve access and uptake of energy efficiency programs. The details of these efforts are described below.

Background: Community and Labor Stakeholders Engaged to Date

Community-Based Organizations

Over the last year, Focus has increased its outreach efforts with community-based organizations (CBOs) that work with marginalized communities to gather input on effective methods to reduce barriers to existing state program participation for the populations they serve. The learnings of this ongoing effort can be applied to implementing the HOMES program rebates to ensure communities with the most need will have access to and experience the program’s benefits. Focus recently interviewed staff and volunteers at 20 CBOs throughout Wisconsin to learn how energy intersects with their work, build relationships, gauge interest in future collaboration with Focus, and learn how they target their services to overcome barriers to helping those most in need.

The CBO partners selected for interviews serve communities:

- on low- or fixed-incomes;
- with significant populations of people of color, non-English or limited-English speaking populations;
- that are rural; or
- that are predominantly older adults (aged 65+), veterans, renters, or people living with disabilities.

The approach to selecting CBOs for interviews also considered their geographic service territory and the extent that territory overlaps with Justice40 DACs (based on the Department of Energy’s CJEST screening tool). Many of these organizations specialize in emergency food provisions (food pantries), housing services, and other emergency and social services.

This engagement was performed during spring and summer of 2023. Through this effort, Focus staff gained familiarity with the programs available to assist homeowners and renters in improving energy efficiency in Wisconsin. Focus staff also came away from these interviews with specific information on barriers to participation, areas of interest for these customers, and connections for further outreach and engagement, including potential collaboration on new federal energy rebate programs (i.e., Home Energy Rebates).

Some of the main themes learned from interviews conducted by Focus, which the State of Wisconsin will consider during the design and implementation of the HOMES program, include:

- CBOs need a clear understanding of energy efficiency programs available (e.g. eligibility requirements, equipment or services covered, etc.).
- Underserved communities are less likely to be aware that energy-saving programs, like Focus, exist or how to take advantage of them.
- Renters have limited opportunities to participate in efficiency programs, despite often having higher energy burdens and societal disadvantages. Program administrators should consider how to engage landlords on programming that benefits tenants, as well as how to communicate what programs are available for tenants to participate in directly.
- Older adults are a uniquely underserved demographic that live on a fixed income, are less likely to receive information when promoted digitally or when online participation is required and are wary of scams.
- First costs of energy efficiency projects remain a barrier to participation, even when higher incentives are eligible to lower income participants.
- Cultural and linguistic barriers reduce accessibility to efficiency programs. Offering program materials and websites in additional languages and partnering with CBOs can address this barrier.

In response to these barriers, the State of Wisconsin and Focus staff will continue to engage with these organizations and additional organizations serving as trusted community resources as they are identified, throughout the planning and implementation phases of the HOMES program. The State of Wisconsin recognizes the time and expertise provided by these organizations as well as their ability to reach residents that can benefit the most from efficiency and home energy upgrades. Additional planning and discussion on what framework to use for potential CBO compensation is anticipated, which would include the overall budget, individual or group rates, and qualifying actions.

A list of some, but not all, of the community-based organizations that Focus has engaged with to date are listed below.

Community-Based Organizations Engaged to Date

- Wisconsin EcoLatinos
- Walnut Way / Lindsay Heights Neighborhood Improvement District
- Sheboygan County Housing Coalition
- Green Homeowners United
- Citizens Action Wisconsin (energy burden coordinator)
- Elevate Energy
- Wisconsin Citizens Utility Board
- Aging & Disability Resource Center (ADRC) of Dane & Brown Counties
- Urban League of Greater Madison
- Food pantries: WayForward (formerly Middleton Outreach Ministries), Stepping Stones, CORE Community Resources, and Project Bootstrap

Local Governments Engaged to Date

Over the last year, Focus has built new relationships and strengthened existing relationships with local governments across Wisconsin. Focus recently hired a Community Liaison Manager to fulfill this role. Since then, staff have met with over 50 local governments across Wisconsin to learn how the program

can better support local energy goals and partner to ensure their residents and businesses are aware of energy efficiency resources and incentives available to help them save energy/money. Local governments have been engaged to date to understand their priorities for delivering the HOMES program benefits to their residents, as well as to identify locations and stakeholders to engage during the HOMES program planning process. The Focus Community Liaison Manager will serve on the HOMES program team supporting coordination and engagement with local governments.

Focus has also built relationships with the Wisconsin Local Government Climate Coalition and Wisconsin Department of Natural Resources (DNR) Green Tier Legacy Communities program. These groups support communities that are actively involved in promoting the Focus program or creating their own energy efficiency programming for their localities. The communities engaged thus far have expressed interest in learning more about Inflation Reduction Act funds and are anticipated to be active partners in connecting residents to participate in and benefit from the HOMES program.

Through its outreach and engagement efforts over time, Focus has established relationships with the following partners representing local governments:

- **Wisconsin Local Government Climate Coalition (WLGCC)** WLGCC is a collective of cities and counties in Wisconsin that together, represent 1 in 3 Wisconsin residents. The goal of the coalition is to advocate for strong climate action in the state. The group has been supportive of Focus and energy efficiency generally and is eager to help support engagement and participation in new federal funding opportunities, including the U.S. Home Energy Rebate programs in Wisconsin.
- **WI Department of Natural Resources Green Tier Legacy Communities (GLTC)** Hosted by the Wisconsin DNR, the GLTC are a group of local government leaders preparing for the future and building sustainable and resilient communities. The GLTC network advances sustainable, efficient practices to stretch local government resources. It includes mostly different cities from the WLGCC, including areas of the state that have high rates of delivered fuels.
- **Vernon County Energy District (VCED)** The VCED is a nonprofit located in Vernon County, WI with a goal of fostering local, sustainable energy to meet the needs of the county. They promote energy efficiency and renewable energy resources, and have expressed an interest in these federal funds due to the high energy burdens and proportion of delivered fuels in their area.

Tribal Governments

The Focus program is available to all 12 Tribal governments in Wisconsin that are served by participating utilities. Wisconsin will leverage the Focus program's existing and growing relationships with Tribal governments to ensure that Tribal communities have access to participate in the HOMES program. For example, to increase participation in energy efficiency programs amongst tribal members and in homes on tribal land, Focus partners with Tribal governments to offer a special program to train tribal community members on Building Performance Institute certification to enable more homes on tribal land to qualify for higher insulation and air sealing rebates. This program not only builds energy efficiency workforce skills, but also improves the payback of insulation and air sealing through higher rebates. Focus is also partnering with two local energy efficiency nonprofits, Slipstream and Elevate, to

improve the efficiency of multifamily homes on tribal land, including the weatherization and installation of air source heat pumps to reduce propane usage and provide efficient air conditioning to these spaces.

The PSC and Focus on Energy staff held the first Tribal Energy Symposium in spring of 2023. Six Tribal Nations attended along with representatives from utilities, DNR and Slipstream. The Symposium was convened to promote energy efficiency programs available for Tribes, identify Tribal government needs and goals that relate to energy, and identify the most efficient way to participate in existing Focus programs. The Symposium was positively received by participants. A second Tribal Nation Energy Symposium was hosted by the Forest County Potawatomi Community (FCPC) in autumn of 2023 to build upon on the work of the spring 2023 event. The second symposium focused on information sharing about grant opportunities, energy planning, and heat pump technology. It also included a tour of the FCPC buildings with renewable energy facilities.

Given the success of these events, the State of Wisconsin commits to hosting a Tribal Energy Symposium in 2025 on the topic of IRA Home Energy Rebates in Wisconsin and how to increase access and participation in the HOMES program.

Ongoing Engagement with Wisconsin's Energy Workforce

Focus on Energy has fostered relationships with its Trade Ally contractor network over time. These valuable contractors and service providers are qualified to partner with Focus to deliver energy efficiency and renewable products (mostly solar) and expertise directly to Wisconsin residents. Focus on Energy promotes the diversity of its contractor network by allowing each Trade Ally to self-identify as a Minority Business Enterprise (MBE), a Women-Owned Business Enterprise (WBE), or a Disabled Veteran Business (DVB). Additionally, the program asks contractors whether they are able to provide Spanish as a spoken language for customers. Interested program participants can search for qualified contractors identifying themselves by these aforementioned statuses using the Focus on Energy "Find a Trade Ally Tool" on the program website.

Additionally, Focus provides Trade Ally contractors with informational materials on current rebates available to customers through Focus, access to building science and new technology training opportunities, and updates on market trends and cutting-edge technologies entering the state market. The State of Wisconsin plans to use the same delivery framework to share information about the IRA HOMES program to Trade Ally contractors.

Focus maintains regular contact with its Trade Ally contractor network through emails and newsletters as well as annual Trade Ally breakfasts held throughout the state. Through these channels Focus shares incentive updates and news about changes to the industry, such as the HOMES rebate program.

While some Trade Ally contractors are union members, it is not a requirement of the program. However, in the past few years two notable engagements with union contractors have emerged. Green Homeowners United, a union contractor and Trade Ally, are also vocal advocates for the program and provide Focus with feedback on field trends, emerging technology, and solutions to traditional barriers to program participation. In late spring of 2023, Green Homeowners United invited Focus staff to attend an event at the Laborers' International Union of North America (LIUNA) training facility, regarding preparing a green workforce for the IRA rebates. Several organizations agreed to ongoing partnership to share information and collaborate, including Focus on Energy, Revitalize Milwaukee, Wisconsin Department of Health & Safety's Lead Safe Homes Program, Dane County Office of Energy & Climate

Change, Laborers' Union, and others. The State of Wisconsin plans to continue engaging with these groups and communicate opportunities that the HOMES rebates can present once available.

Coordination with Low-Income Weatherization Assistance Program: Wisconsin's Department of Administration's Division of Energy, Housing, and Community Resources (DEHCR)

In preparation for this program, the PSC and Focus staff conducted outreach and coordination with the Wisconsin Department of Administration's Department of Energy, Housing, and Community Resources (DEHCR). DEHCR administers Wisconsin's Home Energy Assistance Program (WHEAP), Weatherization Assistance Program (WAP) and Home Energy Plus (HE+) Program Services. The outreach and coordination efforts were undertaken to explore opportunities to integrate HOMES program opportunities to benefit low-income residents of the state who may also be participating in other federal low-income energy assistance programs. PSC and Focus staff have established recurring coordination meetings with DEHCR staff. The State of Wisconsin commits to continued engagement and partnership with DEHCR throughout the planning, design, and implementation of the HOMES program. Specific commitments for this coordination include:

- Coordination meetings (at least quarterly) to discuss program performance and identify opportunities for enhanced collaboration and process improvements.
- Exploring the opportunities for one or more agreements (e.g., Memorandum of Understanding) between the PSC and DEHCR to support efficient program integration between the HOMES program and WAP with regard to utility data, categorical eligibility and targeting specific homes who may be a good candidate for the Home Energy Rebate programs.

For future engagement, the State of Wisconsin will focus on partnerships with trusted community nonprofits, Community Action Agencies (CAAs) (funded by DEHCR), rural electric municipal and cooperative utilities, and landlord associations that overlap with DAC territories and rural areas of the state to ensure that marketing and outreach of the HOMES program is targeted to DACs and customers heating and cooking with delivered fuels. CAAs implement the Weatherization Assistance Program in the state and can offer referrals to households that are good candidates for HOMES (outside of any federally-funded work already planned to be done in a home), particularly for multifamily housing. The State of Wisconsin will work with these CAAs to encourage referrals to households located in DACs to deliver the energy efficiency and electrification benefits that the HOMES program can offer to these communities.

The State of Wisconsin has established a strategic objective to target HOMES programming toward households throughout the state that rely on delivered fuels as their primary heating source. These households tend to be located in rural areas and may also overlap with DACs. The following factors have contributed toward the State of Wisconsin establishing this strategic objective:

- Customers that rely on delivered fuel as their primary heating source are more likely to spend a greater portion of their income to heat their home than customers with natural gas service. As a result, these households are less likely to experience increased energy costs when electrifying their space and water heating equipment.
- Customers that rely on delivered fuel as their primary heating source are likely to experience greater volatility in the cost to heat their homes compared to customers relying on other fuels.

- Customers that rely on delivered fuel as their primary heating source are not eligible for Focus rebates when fuel switching from delivered fuels to electricity. HOMES rebates may help to address a market gap.
- Customers served by municipal utilities and electric cooperatives have lower electric rates, on average, compared to customers of investor-owned utilities.

Future Community and Labor Stakeholder Engagement

The section below outlines some of the community partners that have already been identified – whether by previous engagement with Focus, the PSC, or through referrals from partners – that will be key to distributing IRA HOMES program rebates equitably in Wisconsin. The list is not intended to be comprehensive. The State of Wisconsin recognizes that as staff engage these partners, utilities, local governments, and other stakeholders and that as awareness of the HOMES program grows, more organizations and stakeholders will become important partners. As a separate but related effort, Focus is in the process of analyzing and understanding which customers have historically been underserved by the program. As a result of this research, it is anticipated that Focus staff will seek new partnerships to boost participation in both Focus and HOMES programming in these geographic areas of underserved communities.

In addition to this targeted outreach, the State of Wisconsin held multiple public input sessions as part of planning for the IRA Home Energy Rebate programs. The dates of these sessions are presented in the table below. In-person and virtual attendance options were provided, with Spanish translation provided at some locations for accessibility, to provide educational information about the benefits of these programs to interested stakeholders. Locations for public input sessions were determined based on local government feedback that these should be held across the state, located in or near Justice40 disadvantaged communities, and accessible by multiple forms of transportation. Local governments also provided a list of CBOs to invite to participate and recruit community members to attend. An online survey was also developed to gather public feedback on key program design elements. The feedback collected from local governments, contractors, community-based organizations, and residents were used to inform the final design of the HOMES rebate program are included in this CBP to ensure that the funds will benefit the communities that are served. Many of the stakeholders mentioned in this CBP were invited to attend these events or at a minimum, provide their feedback via online survey. Through Wisconsin’s public engagement process, staff engaged over 590 individuals and entities (not including contractors) to provide feedback on program design. A breakdown of participation can be found in the table below.

Table 1: Participation by Event and Outreach Platform

In-Person Session Summary			
City	Date/Time	Location	Attendees
Green Bay	Tuesday, January 23, 2024 1:30-3:30 pm	Brown County Central Library	34
Milwaukee (North)	Thursday, January 25, 2024 6-8 pm	Washington Senior Center	13
Milwaukee (South)	Thursday, January 25, 2024 6-8 pm	Urban Stables	12
Madison	Tuesday, January 30, 2024 6-8 pm	Village on Park	27

Viroqua	Monday, February 12, 2024 6-8 pm	Vernon County Museum	31
Ashland	Tuesday, February 20, 2024 6-8 pm	Blue Wave Inn & The Sandbar	40
		<i>In-person Session Total</i>	<i>157</i>
Virtual Session Summary			
Virtual #1	Thursday, February 8, 2024 6-7:30 pm		81
Virtual #2	Monday, February 26, 2024 6-7:30 pm		101
		Virtual Session Total	182
Online Survey Summary			
Available January 2, 2024 – February 29, 2024			253
		All Total	592

For residential in-person and virtual engagement sessions, attendees were provided a presentation overview of the IRA Home Energy Rebates before input was collected through facilitated small group discussions. During these discussions, the following questions, which were similar to the online survey prompts, were asked:²

1. What best describes you? (Resident, trade ally, and/or community or promotional partner)
2. What equipment would you be interested in installing in your home?
3. Who do you trust most to learn about improving your home or reducing your energy use?
4. When making home energy upgrades, which three factors are most important to you?
5. How familiar are you with income qualification and the area median income?
6. What approach would you recommend for Wisconsin:
 - a. Offer moderate rebates to enable more households to participate
 - b. Increase rebate amounts for low-income and/or energy burdened households
 - c. Offer DOE-defined maximum rebates for all equipment
 - d. No preference
7. Which approach would you prefer Wisconsin use in structuring its IRA Home Energy Rebate programs?
 - a. Make IRA rebates available to as many Wisconsin households as possible
 - b. Prioritize serving households with incomes below a certain level
 - c. Prioritize households that currently cannot take advantage of Focus on Energy
 - d. No preference
8. Do you have suggestions on how Wisconsin's IRA Home Energy Rebates can best reach DACs, high energy burdened customers, and/or low-income communities?
9. How restrictive should Wisconsin be on retroactivity?
10. Do you plan to participate?

For Trade Ally contractor feedback, more than 450 contractors registered to attend input sessions across the state. The dates and locations of these engagements can be found in the table below:

² The questions listed here are not exhaustive nor worded verbatim, but rather are summarized here for brevity. For an unabridged version of questions, asked in the precise wording in which they were posed, please refer to the Stakeholder Outreach Summary.

Focus on Energy Sponsored Breakfasts – 459 Registered Attendees	
City	Date
Green Bay	Tuesday, January 23, 2024
Wausau	Wednesday, January 24, 2024
Milwaukee	Thursday, January 25, 2024
Pewaukee	Friday, January 26, 2024
Madison	Tuesday, January 30, 2024
Xcel Energy Sponsored Breakfasts	
Onalaska	Tuesday, February 13, 2024
Eau Claire	Thursday, February 15, 2024
Ashland	Wednesday, February 21, 2024

Trade ally contractors were asked:

1. Will your company participate in the IRA Home Energy Rebate programs?
2. Would your company be interested in working in DACs, if there were funding to support bonuses for projects completed there?
3. Does your company currently assist with income verification?
4. Do you agree with requiring envelope improvements be completed before HVAC upgrades?
5. Do you have any other thoughts to share regarding retroactivity?

Below is a summary of themes heard from stakeholder groups. A detailed review of feedback provided from stakeholder feedback sessions can be found in the Stakeholder Outreach Engagement Summary which has been included as a separate document in this application.

Themes from Public Engagement Events (including in-person, virtual, and online survey responses):

- Insulation and air sealing projects were of highest interest to potential program participants, followed by heat pumps for space heating and cooling and heat pump water heaters.
- Focus on Energy is the most trusted information source for residents to learn about home energy projects or reducing their energy use.
- Saving money is the most important factor for why residents in Wisconsin make home energy upgrades, followed by reducing energy use.
- Overall, residents are only somewhat familiar with area-median income to determine whether their household is eligible.
- Overall, responses were nearly equally split amongst those engaged that said they preferred the State of Wisconsin to offer low-to-moderate rebate amounts to serve as many households as possible versus prioritize households with lower incomes and high energy burden.
- Participants stressed the importance of partnering with community-based organizations to spread awareness of the program when available.
- Participants stressed the opportunity of partnering with the state Weatherization Assistance Program providers to deliver these funds to those that could benefit the most.
- Participants stressed the need to engage landlords to ensure that renters are not left out from benefiting from the IRA HOME Energy Rebate programs.
- Many Wisconsinites expressed interest in participating in the program immediately or within 3 years of the program being available. Customer excitement for these IRA HOMES programs is very high.

- Rural customers expressed serious concern of contractor availability – especially for energy assessors – in their area and the lack of contractors could exclude their ability to access these funds.
- Cost of energy assessments were raised as a potential barrier to participation.

Themes from Trade Ally Engagement Events (including in-person and online survey responses):

- Most Trade Allies responded that they would likely participate in IRA HOMES Programs. Trade Allies stated that the reason for their affirmative answer was the opportunity to reach underserved and low-income communities with instant rebates. Trade Allies noted that this is also an opportunity to expand their customer base due to demand in the marketplace.
- Trade Allies who stated they were not likely to participate cited federal program “red tape” and the perception that there will be too many roadblocks to deliver the rebates to customers. Income qualification liability, federal audits at the contractor level, income approval wait times, and cashflow concerns were also common themes heard at multiple sessions.
- Material and labor scarcity in Northern Wisconsin may be a participation barrier.
- All Trade Allies seemed to agree that retroactivity, in some form, is necessary given high market awareness of energy efficiency programs set to launch because of the Inflation Reduction Act.
- Trade Allies were not in agreement whether envelope improvements should be required to be completed before HVAC upgrades. Trade Allies who did not agree stated they disagreed in instances where health and safety would not allow envelope work to be completed first or when envelope work is not deemed necessary due to adequate condition of existing materials.
- Trade Allies stressed the importance of determining program requirements in all areas as soon as possible to allow them to prepare adequately for program launch. Insulation Installers and Home Energy Assessors both voiced the need to have a complete set of rules surrounding the energy assessments required for this program as soon as possible to allow businesses to learn the software tools. It was suggested that once program design and requirements have been finalized, a training course would be helpful for Trade Ally contractors.
- Trade Allies who work in rural Wisconsin expressed interest in being able to provide rebates to customers on delivered fuels. They suggested that working with electric utilities and delivered fuel providers would be the best way to reach this historically underserved population.

The State of Wisconsin intends to maintain open and transparent engagement with its community and labor stakeholders throughout the planning, implementation, and evaluation phases of the HOMES program. The State of Wisconsin anticipates a future stakeholder engagement approach (e.g., type and frequency of the engagement) that is customized to the needs of the stakeholder group. Community and labor organizations that have been identified as key stakeholders to engage with to ensure that the benefits of the HOMES program go to the communities that need them most are discussed in the sections below. Additional stakeholder organizations may be identified and included in the state’s outreach and engagement strategy during future program phases.

Community Stakeholders to be Engaged:

Outreach and engagement to community and labor stakeholders will vary, but the majority of outreach to community stakeholders will likely be one-on-one meetings and discussions to build trust and value the unique perspectives and networks that each group can provide to ensure their community benefits from the HOMES program. Some, but not all community stakeholders that Wisconsin will engage are

mentioned below. Added context is provided for some organizations that have not been mentioned before or whose mission or role may not be self-explanatory.

- Wisconsin Local Government Climate Coalition
- Focus on Energy Partnered Community-Based Organizations
- Vernon County Energy District
- DNR Green Tier Legacy Communities
- Reclaiming Our Neighborhoods (RON) Coalition (Milwaukee)
- Sheboygan Housing Coalition
- UMOS (Milwaukee), Centro Hispano (Milwaukee & Dane Counties), Wi EcoLatinos (Dane, Rock, & Columbia Counties), Dane County Latino Academy of Workforce Development
 - These groups will provide insight on program design and marketing materials intended for Spanish speaking audiences, and can potentially provide referrals for Spanish speaking contractors to become Trade Allies.
- Hmong American Partnership (Appleton) and Hmong American Center (Wausau)
 - These groups can provide insight on program design and marketing materials intended for Hmong speaking audiences and can potentially provide referrals for Hmong speaking contractors to become Trade Allies.
- 16th Street Community Health Center (Milwaukee)
 - This group is a strong partner of the City of Milwaukee's Environmental Collaboration Office on environmental programming, but are also a strong CBO in their area of Milwaukee. Intended outcomes of engagement would be that this organization would understand the new and existing efficiency programs to connect and support residents in their community to participate.
- Habitat for Humanity (chapters across the state) & Revitalize Milwaukee
 - Both of these organizations complete home improvement and repair projects for residents with low-to-moderate incomes. In various forms, these groups are already installing or doing work adjacent to health and efficiency in the homes they work in. An intended outcome of engagement will be to make sure that these organizations are aware, and when appropriate implement projects using federal and state funds, to improve the lives of those living in the housing that they support.
- Community Action Program (CAP) agencies that implement Weatherization Assistance Programs, specifically those in high energy burdened counties with high propane or poverty levels. This outreach will be done in conjunction with DEHCR and is anticipated to include: CouleeCAP, Social Development Commission, Western Dairyland CAP, North Central CAP, West Central CAP, Central WI CAP, and Ashland County Housing Authority CAP.
 - Beyond just the coordination with the WI Department of Administration / Division of Energy, Housing and Community Resources on Weatherization Assistance Program, the intended outcome of this engagement would be a concerted effort to ensure partnerships and projects are completed with weatherization implementers in areas of the state that face the highest energy burdens.
- Walnut Way / Lindsay Heights Neighborhood Improvement District, Sherman Park ECO Neighborhood, Northwest Side Community Development Corporation, and Citizens Action WI

- These are neighborhood groups or community leaders (outside of RON Coalition) that serve Milwaukee residents that are energy burdened and in disadvantaged communities. Intended outcomes of engagement with this group would be that they can connect and refer residents in disadvantaged communities with energy burdens to participate in the HOMES program, as well as participate in workforce pipeline to diversify workforce as opportunities arise.
- Blacks for Political and Social Action
 - To partner with an organization that serves the BIPOC community of the Madison-metro area that could share awareness of these programs and the benefits of participation in their community.
- Wisconsin Apartment Association, as well as [regional apartment associations](#)
- Wisconsin Association of Housing Authorities
- Wisconsin Housing and Economic Development Authority (WHEDA)

Labor Groups to be Engaged:

Wisconsin will continue to engage the state’s clean energy workforce through Focus’ Focus on Energy Trade Ally contractor network. Focus will routinely communicate and seek contractor input on program design elements as well as recruit existing Trade Ally contractors to implement the HOMES rebates as Registered Contractors.

In addition, the State of Wisconsin will build or expand upon existing relationships with the following labor groups, likely through one-on-one conversations and meetings:

Plumbing, Heating, Cooling Contractors of Wisconsin

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

Wisconsin Chapter of National Electric Contractor Association

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

IBEW Locals 127, 890, 965, 388, 953, 577, 2150

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

LiUNA WI Laborers' District Council

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

BlueGreen Alliance, WI

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

Investing in Job Quality and a Skilled Workforce

As described in the above section, Focus has fostered relationships with its Trade Ally contractor network over time. Focus promotes the diversity of its contractor network and provides Trade Ally Contractors with training opportunities and updates on market trends and cutting-edge technologies entering the state market. The State of Wisconsin's Office of Energy Innovation (OEI) has applied for an IRA Section 50123 Contractor Training Grant and has provided the U.S. DOE the application, program scope, and implementation plan for that funding. The State of Wisconsin plans to use those funds to invest in quality jobs and a skilled workforce capable of implementing the work needed to meet the goals of the HOMES program, and some details of that program are provided in this section.

Training for Residential Energy Contractors (TREC)

The OEI submitted a plan to DOE for the use of grant funds under the IRA Section 50123 funding opportunity and plans to use those funds to provide training grants to eligible entities, including organizations like technical colleges and other U.S. Department of Energy (DOE) approved certified training entities, to meet workforce training and certification needs across the state. This implementation plan was developed through discussions with key stakeholders including the Wisconsin Department of Workforce Development (DWD), the Wisconsin Technical College System (WTCS) and others. OEI staff met several times with key DWD staff to discuss the energy workforce needs of the state. DWD provided OEI with data projections and consulted on the approach to its TREC grant application. The identified needs have been factored into the planned program design, which would create and launch a grant program to provide funds to eligible entities that are DOE certified and experts in the workforce landscape of various Wisconsin communities. Through initial outreach, OEI has already identified 36 potential training locations, with outreach to other prospective applicants underway, that could apply for funds through this program to provide certification to new workers or upskill existing workers.

Through existing programs, OEI has a history of working with private entities, including contractors, in program implementation. As part of the TREC-funded program, OEI will design and convene a Workforce Advisory Group to help shape the direction of the program funded through TREC. This advisory group will be composed of subgrantees and contractors, and their contributions will help shape the design and direction of the program to meet changing workforce demands. As members of the Workforce Advisory Group and stakeholders engaged throughout the program's development, employers will have an opportunity to build relationships with the OEI and training partners. In helping

to connect trainees with job opportunities, employers will have the opportunity to provide feedback and critical data on job quality and pay that can help shape program design and training needs. Focus on Energy staff working on delivery of HOMES will participate as members of the TREC Advisory Group to ensure its efforts are well coordinated with workforce needs of the HOMES program. In addition, through its connection to OEI, Focus will share information with grant-funded training programs with its Trade Ally Network and CBOs that are interested in creating their own local workforce to encourage ongoing learning and development for workers on HOMES funded projects.

In 2026, the State of Wisconsin commits to identifying Justice40 DACs that have low participation rates in the IRA Home Energy Rebates due to contractor availability. Contractor availability can be quantified by a 100-mile radius from a IRA Home Energy Rebates Registered Contractor. The State of Wisconsin commits to coordinating with the 50123 TREC effort to train contractors in these areas to reduce barriers to participation in these areas. As part of the implementation of this HOMES program, the State of Wisconsin also commits to coordinating job training opportunities through TREC and communicating these opportunities to HOMES program participants that have self-selected (through post-participation satisfaction survey) to be kept apprised of job training opportunities in the clean energy workforce. These efforts will help the State of Wisconsin ensure the Wisconsin TREC program is doing outreach, engaging with, and training contractors in areas of the state that need certified and trained workers to implement the HOMES and HEAR programs.

Labor Relations

The historic levels of federal funding available through HOMES and HEAR programs will encourage new workers and create quality jobs in a range of careers. The State of Wisconsin and Focus pledge to remain neutral during any union organizing campaigns and allow union organizers access to outreach events and appropriate onsite non-workplaces. As part of the TREC funded program described in section Training for Residential Energy Contractors above, OEI plans to work with DWD to monitor job data in the Energy Auditor, HVAC Contractor, Plumbing, Electrical, and Home Performance Contractor sectors, gathering data on both job quality and quantity.

As discussed in the Engage Community and Labor section, the State of Wisconsin plans to engage further with Labor groups including LiUNA and IBEW Local branches on both the TREC program as well as to connect with jobseekers that have participated in the HOMES program. Likewise, as the clean energy workforce grows and changes in response to the HOMES program, the State of Wisconsin commits to sharing these trends with the Wisconsin Department of Workforce Development in order to ensure momentum in the industry continues to evolve during and after this program.

Diversity, Equity, Inclusion, and Accessibility

The State of Wisconsin is committed to incorporating diversity, equity, inclusion, and accessibility (DEIA) objectives into the HOMES program plan, design, and implementation. Below is a description of the State of Wisconsin's commitments to DEIA in these areas.

Commitment 1. The State of Wisconsin commits to partnering with Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and Veteran Owned Businesses for contractor support needs to deliver the HOMES program. Specifically, the State of Wisconsin commits to the following:

Commitment 1.1: Focus commits to developing a network of diverse contractors from a variety of backgrounds, including working to provide customers a choice of contractors who are: Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and/or Veteran Owned Businesses, and/or Spanish-speaking contractors to serve customers' needs.

Summary of scope of work: Focus has statewide network of Trade Ally contractors and currently allows these contractors to self-identify in the categories listed above. Customers can then filter contractors on the "Find A Trade Ally Tool" based on these DEIA categories that are located within their proximity. The State of Wisconsin commits to continuing – and expanding – this work for residents of Wisconsin to be able to search for IRA Home Energy Rebates Registered Contractors with these same DEIA designations.

Commitment 2.1: The State of Wisconsin commits to increase IRA Home Energy Rebates Registered Contractors that either identify as a Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and Veteran Owned Businesses, or Spanish-speaking services offered or that serve predominantly DAC(s) per year. These contractors would be searchable on the Find a Trade Ally Tool as eligible installers of HOMES program work. The State of Wisconsin has a goal of recruiting at least 10 such new IRA Home Energy Rebates Registered Contractors in the first year of the HOMES program, with a goal of recruiting 5 new contractors in subsequent years of the program.

Summary of scope of work: Focus will engage with community partners, such CBOs, local governments, utilities, and labor groups to identify and recruit eligible contractors and engage them in the standard training process necessary to be added to the program's list of qualified contractors. Connections to newly trained staff through other efforts such as the TREC program discussed in Training for Residential Energy Contractors may provide pathways to recruiting from new groups that will assist in meeting these goals.

Commitment 3.1: The State of Wisconsin commits to partnering with at least 2 technical colleges in the state to encourage them to include rebate-eligible technologies into their curriculum during the implementation period of the HOMES program, to foster a future clean energy workforce pipeline.

Summary of scope of work: OEI has begun and will continue to reach out to technical colleges, explain the HOMES program and eligible technologies and pathways to achieve rebates, as well as market impacts, and encourage technical colleges to start or bolster their clean technologies education curriculum. This will be done in conjunction with the TREC funded program discussed in Section Training for Residential Energy Contractors.

Commitment 2. The State of Wisconsin commits to implementing a plan to reduce barriers and improve access to jobs for local and underrepresented workers, including DAC residents, those with disabilities, returning citizens, opportunity youth, and veterans.

Commitment 2.1: The State of Wisconsin will work to develop a partnership with pre-apprenticeship or apprenticeship readiness programs to foster improved access for underrepresented workers to jobs.

Name of readiness programs:

- IBEW 195 apprenticeship program
- [Wisconsin Electrical Apprenticeship & Training Program](#)
- Wisconsin Plumbers Union Local 75 Apprenticeship Program

Scope of Work: Focus will engage with community partners, such CBOs, local governments, utilities, Wisconsin Department of Workforce Development, and union labor groups (listed previously) to identify and recruit eligible jobseekers and past participants of HOMES and connect them with union energy-related career paths. This strategy will begin with and will be based off early discussions with union labor groups, as its scope will be dependent on union halls' ability to absorb and recruit new workforce participants. That said, in workforce-related efforts regarding the IRA Home Energy Rebates, the State commits to including union career paths as options when connecting jobseekers to opportunities that arise from this funding.

Commitment 2.2: The State of Wisconsin will partner with training and placement programs [other than apprenticeship programs] for underrepresented workers.

Name of training and placement programs:

- Wisconsin Department of Workforce Development
- Building Science and Energy Management Program – Associate degree at Western Technical College
- Sustainable Energy Management Program – Associate degree at Southwestern Technical College

Scope of Work: Much like the scope of work described in Commitment E2.1, Focus will engage with community partners, such CBOs, local governments, utilities, Wisconsin Department of Workforce Development, and union labor groups (listed previously) to identify and recruit eligible jobseekers and past participants of HOMES and connect them with non-union energy-related career paths. This strategy will begin with and will be based off early discussions with technical colleges, as its scope will be dependent on union halls' ability to absorb and recruit new workforce participants. That said, in workforce-related efforts regarding the IRA Home Energy Rebates, the State commits to including non-union career paths as options when connecting jobseekers to opportunities that arise from this funding.

Justice40 Initiative

The Wisconsin HOMES program [PENDING COMMISSION DECISION] defines DACs as those communities corresponding to the US DOE's CEJST boundaries. The program design and delivery will quantify and track the project benefits that flow to residents of these areas. Many of these metrics were stated in the Purpose and Introduction section after the SMART goals for the program were outlined. The program will measure benefits flowing to these communities from projects completed at buildings located in these communities. Program spend will also be an important metric to measure and track to ensure that the HOMES program benefits DACs. The State of Wisconsin will track multiple forms of benefits to DACs through its rebate tracking and processing system and through program evaluation activities. The State of Wisconsin will use these processes to actively monitor program performance and ensure that applicable benefits flow to DACs.

Encouraging delivery of home efficiency rebates to disadvantaged communities: The Wisconsin HOMES program will increase the ability of low-income households to overcome the barrier of upfront costs of energy efficient technology by encouraging eligible participants to stack HOMES rebates with those offered Focus and other funding sources as appropriate. The State of Wisconsin has several strategies to encourage participation, and therefore the benefits of the HOMES program, to disadvantaged communities.

The State of Wisconsin is working on the development of project application materials to easily qualify residents of DACs for rebates. Focus will use metrics to track and report on benefits that are delivered in DACs including:

- Number of projects completed in Justice40 DACs.
- HOMES rebate spend (total dollar amount and proportion of program spend) for projects completed in Justice40 DACs.
- Estimated energy savings from projects completed in Justice40 DACs.

The State of Wisconsin plans to make income verification for the HOMES program as easy as reasonably possible to enable participants to receive the maximum incentives they are eligible for. The State of Wisconsin intends to leverage existing Focus processes and procedures in the income-qualification process to facilitate an understandable and user-friendly process. Details of Focus's existing process are described below.

Focus has offered higher incentives to income-qualified residential customers for many years. Beginning January 2024, Focus modified its income qualification process to better align with the IRA HOMES and HEAR criteria. With this modification, Focus transitioned from using state median income (SMI) as the basis for determining customer income-eligibility to using AMI. Two other major changes in 2024 include allowing self-attestation and nearly instantaneous approval through online forms. Focus had already established processes to allow categorical eligibility for its income-qualified incentives. Customers that are verified as already qualified for the state and federal means-tested programs listed below can receive Focus's higher incentive amounts:

- Wisconsin Home Energy Assistance Program (WHEAP)
- Supplemental Nutrition Assistance Program (SNAP/FoodShare)
- Lifeline Support for Affordable Communications (Lifeline)
- National School Lunch Program – Free (NSLP)
- Housing Opportunities for Persons with AIDS
- Weatherization Assistance Program (WAP)
- Medicaid
- Wisconsin Head Start
- Food Distribution Program on Indian Reservations (FDPIR)
- Housing Improvement Program (HIP)
- Supplemental Security Income (SSI)

For households that are not categorically eligible under one of the aforementioned programs, the Focus program offers an express eligibility option where customers can provide the first two pages of the most recent year's tax form 1040 for each member of the household that earns income. Absent that, Focus will also accept the most recent 30-day proof of income for each member of the household that earns income. This tiered eligibility approach allows participants to verify income via the least time-intensive and burdensome routes available to them. To reiterate, the State of Wisconsin intends to build upon this experience of creating user-friendly income verification processes to reduce barriers in disadvantaged, overburdened communities.

The State of Wisconsin will focus on partnerships with trusted community nonprofits, Community Action Agencies (CAAs) (funded by DEHCR), and landlord associations that overlap with DAC territories to ensure that marketing and outreach of the HOMES program is targeted to DACs. CAAs implement the

Weatherization Assistance Program in the state and can offer referrals to households ineligible or that choose not to participate in that program. The State of Wisconsin will work with these CAAs to encourage referrals to households that are good candidates for HOMES.

The State of Wisconsin commits to prioritize building relationships with CBOs in energy burdened and disadvantaged communities. These organizations can serve an important role as promotional partners for the program. Working with trusted community leaders in DACs will be an important strategy for encouraging households located in these communities to participate, especially if they have limited familiarity with energy efficiency programs to date. The State will also prioritize distributing marketing collateral and performing partnership outreach to neighborhood associations located in DACs to spread awareness is spread during the program's early stages, to give households time to plan for energy projects that were previously financially out of their reach. Moreover, the State will engage landlord associations and tenant advocacy groups to explain the program's benefits and the participation pathways available for low-income multifamily housing.

The State of Wisconsin and Focus will track contractor engagement with households located in DACs to determine the amount of program funds flowing to those communities. The program will provide Registered Contractors a [PENDING COMMISSION DECISION] bonus for each project or dwelling unit located in a Justice40 DAC upon completion and verification of the work done. The State of Wisconsin will develop a publicly available list of Registered Contractors. Only those contractors that have been approved by the State as a Registered Contractor prior to completing the project will be eligible for the DAC bonus incentive. The State of Wisconsin is planning to use the Pacific Northwest National Laboratory (PNNL) Application Programming Interface (API) tool to verify whether the address corresponding to project location is within a DAC prior to approving payment of the DAC contractor bonus incentive. DAC contractor bonus incentives will be tracked in the State's rebate tracking system. For reporting purposes, each DAC Registered Contractor bonus incentive in the rebate tracking system will include a project identification field to allow the State to identify the HOMES project corresponding to the DAC contractor bonus incentive, and vice versa.

Ensuring applicable benefits from the HOMES program flow to DACs:

While not all low-income households are located in DACs, a good proportion of DACs are located in census tracts with average household incomes below the state and county median incomes. By reserving [PENDING COMMISSION DECISION] % of HOMES rebate funds for low-income households and multifamily tenants, the State of Wisconsin is prioritizing the flow of benefits to households that have faced the highest barriers to participating in existing efficiency programs in the state. The State's outreach and marketing of the program, outlined in Section F1 above and the Education and Outreach Strategy Blueprint is designed to encourage HOMES program participation among households in DACs.

Wisconsin will conduct evaluations to assess the flow of benefits to DACs and measure and report progress toward the goal of ensuring at least 40% of program funding is directed toward projects occurring in DACs. The performance metrics outlined in Section F1 above will be used to indicate whether the state is on track to meet this goal as well as the goal to spend at least [PENDING COMMISSION DECISION] % of the rebate funds on projects for low-income households. It is the state's goal to target outreach and participation of the HOMES program in DACs prior to and at program launch. Regular tracking and reporting of program performance will provide the state with visibility of its progress toward ensuring an appropriate level of benefits are flowing to DACs and allow the state to adapt its program delivery strategies if metrics are not meeting expectations and goals mentioned in this plan.

Below is a list of benefits the State of Wisconsin will ensure flow to DACs as a result of the HOMES program:

Benefit 1: Decrease in Energy Burden: Energy burden is defined as the percent of household income that is put toward home energy costs. Often, a household is considered “energy burdened” when 6 percent or more of their income is spent on their utility bill(s). The activities in this program will improve home efficiency and reduce energy use, resulting in lower utility bills and decreased energy burdens.

DAC that will benefit: All DACs in Wisconsin will be prioritized for this benefit.

How benefit will be delivered: The primary benefit to be delivered are direct benefits in the form of reduced energy usage resulting in reduced home energy costs. These benefits will be delivered from a combination of program partners including the program administration and implementation team, the program’s contractor partner network, CBOs, and state and local governments.

When benefit will be delivered: The benefit of reduced energy usage and costs will be delivered immediately upon completion of a project. These benefits will continue to be delivered to the resident throughout the useful lives of the measures installed.

Milestones toward benefit delivery: Key milestones toward benefit delivery include:

- As mentioned in SMART goals table, develop a list of qualified contractors available to serve residents in DACs and ensuring that this list is easily accessible to potential program participants.
- Development and dissemination of targeted outreach, education, and promotional materials with CBOs in Justice40 DACs.
- Development of project application materials to easily qualify residents of DACs for rebates. Metrics on benefits to track and report when evaluating program include:
 - Number of projects completed in DACs
 - Number of projects completed in census tracts with high energy burdens
 - Estimated energy savings from projects completed in DACs
 - Estimated energy savings from projects completed in census tracts with high energy burdens
 - Customer satisfaction with program
 - Customer self-reported energy bill impacts

Community-based organization(s) to be engaged with when delivering this benefit:

- Aging & Disability Resource Center (ADRC) of Brown County
- Habitat for Humanity – Green Bay
- Neighborworks Green Bay
- House of Hope Green Bay, Inc.
- Paul’s Pantry (Green Bay)
- Century City Triangle Neighborhood (Milwaukee Northside)
- Walnut Way Conservation Corps & Lindsay Heights Neighborhood (Milwaukee Northside)
- Citizen Action WI – Energy Burden Coordinator (Milwaukee Northside)
- Northwest Side Community Development Corporation (Milwaukee Northside)
- Dominican Center (Milwaukee Northside)
- Social Development Corporation (Milwaukee Northside)

- Serving Older Adults, Inc. (Milwaukee North & Southsides)
- Harbor District (Milwaukee Southside)
- 16th Street Health Center (Milwaukee Southside)
- Muskego Way Forward (Milwaukee Southside)
- VIA CDC (Milwaukee Southside)
- UMOS (Milwaukee Southside)
- Revitalize Milwaukee (Milwaukee Southside)
- Reclaim our Neighborhoods (Milwaukee)
- Blacks for Political and Social Action (Madison)
- EcoLatinos (Madison)
- Operation Fresh Start (Madison)
- Sustain Dane (Madison)
- Tenant Resource Center (Madison)
- Urban Triage (Madison)
- Foundation for Black Women's Wellness (Madison)
- Latino Health Council (Madison)
- Centro Hispano (Madison)
- Latino Academy for Workforce Development (Madison)
- Project Home (Madison)
- Catholic Multicultural Center (Madison)
- Elevate (Madison)
- Urban League of Greater Madison
- CouleeCAP (SE Wisconsin)
- Habitat for Humanity La Crosse (SE Wisconsin)
- Vernon County Energy District
- Living Faith Food Pantry (Viroqua/Vernon County)
- Bethel Butikk Food Pantry and Thrift Shop (Viroqua/Vernon County)
- CORE Community Resources (Bayfield County)
- Cheq Bay Renewables (Bayfield and Ashland Counties)
- Ashland County Aging Unit Inc.
- Ashland Cares Inc.
- Faith in Action Ashland

Benefit 2: A decrease in environmental exposure and burdens: Emissions reduction and associated health benefits of energy efficiency (improved respiratory health and reduced exposure to extreme temperatures and weather).

DAC that will benefit: All DACs in Wisconsin will be prioritized for this benefit.

How benefit will be delivered: The benefit will be delivered to the customer upon project completion, as energy efficiency projects, particularly those that include weatherization measures, can lead to improved indoor air quality and ventilation, improved respiratory health, and reduced risk of mold and moisture-related hazards.

When benefit will be delivered: The benefits of decreased environmental exposures and burdens will be delivered immediately upon project completion. These benefits will continue to be delivered to the resident(s) throughout the useful lives of the measures installed.

Milestones toward benefit delivery: Development of project application materials to easily qualify residents of DACs for rebates. Metrics to track and report on benefits:

- Number of projects completed in DACs.
- Estimated energy savings from projects completed in DACs.

Metrics to track and report on benefits: Wisconsin intends to use the EPA’s AVOIDed Emissions and geneRation Tool (AVERT) and Co-Benefits Risk Assessment (COBRA) tool to quantify, track, and report the avoided emissions and health benefits attributable to the program.

Community-based organization(s) to be engaged with in delivering this benefit: See the list of CBOs listed in Sections F1 and C2. In addition, the State of Wisconsin commits to exploring partnership and referral opportunities with the Wisconsin Department of Health and Safety (DHS) Asthma Prevention Team to promote the program to families with records of childhood asthma cases. In preliminary conversations, DHS has shared that weatherization measures are a technology they promote to low-income households with known childhood asthma cases. DHS has expressed an interest in leveraging the HOMES program funding to stretch their healthy home project budget while delivering energy saving benefits to customers at the same time. The State of Wisconsin also commits to ongoing outreach to new CBOs, such as community health clinics and centers, that are engaged in similar work in other DACs throughout the state.

Benefit 3: An increase in quality job creation, the clean energy job pipeline, and job training for

individuals: The Wisconsin HOMES program will serve as a catalyst to supporting a growing clean energy workforce in the state. A strategic program objective is to support long-term workforce development opportunities and leverage IRA contractor training grant funding where possible.

DAC that will benefit: Uncertain at this time, but will be refined, targeted, and reported on as 50123 TREC grants are deployed.

How benefit will be delivered: The HOMES program will deliver opportunities for a trained workforce across the state. Successful deployment of HOMES will increase demand for energy efficient and clean energy technologies, expanding an existing construction workforce while providing new opportunities to build skills in new technologies to differentiate contractors in the market.

Distinct from the workforce goals mentioned above, the State will work to identify at least three CBOs in Justice40 DACs to partner with to connect unemployed and underemployed jobseekers with entry points into clean energy careers. Entry points could be defined as creating a cohort of jobseekers to meet minimum count requirements for existing employer workforce training programs, connections to apprenticeship programs identified through IRA Home Energy Rebates engagement with labor groups, or connections to technical college training programs. While the funding for this work is not yet certain, opportunities for grant funding can be explored.

When benefit will be delivered: Throughout the implementation of the HOMES program, but specifically, benefits will accrue and are anticipated to be measurable after five years of program implementation.

Milestones toward benefit delivery: Engage three CBOs located in DACs to scope opportunities to create and in the future fund clean energy career pipelines.

Metrics to track and report on benefits:

- Net-increase in clean energy jobs in the energy efficiency sector, as reported by the [Clean Jobs Midwest Report for Wisconsin](#).
- Enrollment numbers in labor union apprenticeship programs and in technical college energy efficiency career path courses.

- Enrollment numbers in BPI energy auditor certification program in Wisconsin.

Community-based organization(s) involved in identifying or negotiating benefit or developing plan for benefit delivery:

- Wisconsin Latino Academy of Workforce Development
- The Wisconsin Black Chamber of Commerce
- Silver Springs Neighborhood & Milwaukee Area Technical College

DRAFT

Attachment 3

Consumer Protection Plan

State of Wisconsin Home Energy Rebates Home Efficiency Rebate (HOMES) Program

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Purpose

The Consumer Protection Plan (CPP) for Wisconsin’s HOMES Program describes the quality assurance features and procedures Wisconsin will perform to protect consumers and ensure customer satisfaction. The CPP will be available on a dedicated IRA – HER program webpage within the Focus on Energy website for all program participants. The CPP will be reviewed at least every two (2) years, with changes clearly communicated to program partners, participants, and the DOE.

Consumer Feedback

Processing Consumer Feedback

Wisconsin’s IRA Home Energy Rebates Program values receiving feedback from program participants and partners. Interested parties will be able to contact the program through the existing Focus on Energy toll free number (800) 762-7077 and via email (IRAHer@focusonenergy.com). All program contact information will be made public on the program’s web pages at: focusonenergy.com/home-energy-rebates.

When feedback is received through the program email address or toll-free number, Focus on Energy will evaluate the information and report the feedback and required next steps to the appropriate party within 2 business days. All contractor complaints, negative feedback or compliments will be recorded by the party who received the complaint in the database of record upon receipt.

Survey

Within 2 weeks of the completion of a project, customers will receive a consumer satisfaction survey via email, if an email was provided during the application process. This survey will ensure that the initial customer experience was satisfactory and will alert program staff to any program design concerns or complaints. This survey has not yet been designed.

A follow-on survey will be sent to the customer 3 months after the completion of a project. This survey will allow customers to file complaints, concerns, and issues directly to the program. The survey will also contain procedures for addressing negative feedback, including how the programs will communicate the feedback to affected contractors, distributors, or retailers. The survey will include the questions listed in the table below and may also include other questions. This survey has not yet been designed.

Question	Scale
It was easy to understand the rebate requirements and provide the needed information	Scale: Strongly Disagree = 1, Strongly Agree = 5, (include "Don't Know" and "Not Applicable")
It was easy to find a contractor/retailer	
The contractor/retailer provided a high-quality of service	
The rebate was a major reason for my purchase	
My new efficiency upgrades perform well	
My home is more comfortable than it was before the new efficiency upgrades	
My energy bills are lower since the new efficiency upgrades	
Overall, I am satisfied with my experience with the [Rebate name] program	
I would recommend this program to a friend or family member who could use it	
I plan to do more to save energy in my home because of my experience with this program	

Resolution Procedures

Consumer Complaints Resolution

Definitions

Throughout this CPP, the term Program Administrator and Program Implementer are used. The definition for these terms is as follows:

Program Administrator: An entity hired by the State of Wisconsin to administer the program delivery of the IRA Home Energy Rebate Programs.

Program Implementer: An entity hired by the Program Administrator as a sub-contractor delivering one or more programmatic functions of the IRA Home Energy Rebate Programs.

Registered Contractor: A licensed contractor in the State of Wisconsin who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to customers.

Registered Distributor: A distributor of qualified products who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to contractors or customers.

Registered Retailer: A retailer of qualified products who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to contractors or customers.

A complaint or incident is defined as any event in which:

- Customer contacts the Program or representative of the Program and alerts them of an issue that occurred during or as a result of their participation in the Program; or
- An event which deviates from the ideal course of events for customer participation in the program and which could negatively impact the customer's experience.

Notification of Complaints/Incidents

If program personnel (eg. customer service, rebate fulfillment, or field staff) receive a complaint from a consumer regarding a contractor conduct or performance, or are involved in an incident, they are instructed to notify the appropriate Program Implementer as soon as possible.

Upon learning of a complaint or incident, the Program Implementer's senior program manager will designate and assign the complaint or incident to the appropriate staff member. The designee will attempt to contact the individual by telephone within one business day. The designee's goal is to understand the complaint and help resolve the issue as soon as possible. The Program Implementer will respond to safety-related or emergency situations immediately. If a complaint cannot be resolved via the phone, the Program Implementer will schedule a follow-up site visit to further evaluate the circumstances of the complaint.

The Program Implementer will notify the Program Administrator of any complaint that is not resolved within two business days after the Program Implementer receives the complaint, along with a proposed course of action or follow-up plan.

All complaints will be reported to Program Administrator should include the following:

- Customer/Registered Contractor Name
- Address
- Utility Name(s) and Account Number(s)
- Phone Number
- Email Address
- Description of Complaint
- Steps taken to resolve the complaint, including all Program Implementer contacts with the Customer or Registered Contractor
- Results and outcomes of the action taken
- Date of resolution

Complaints will be logged in the contractor or account in the database of record following the Conflict/Incident Documentation Procedures below.

Consumers may also lodge a complaint directly with their Registered Contractor. The contractor will have agreed to the program's Participation Application which will require their adherence to a standard reporting protocol for complaint and incident resolution. Registered Contractors should endeavor to resolve all complaints/incidents with the customer. If they cannot reach an agreement with the customer, the Program Implementer and/or Program Administrator will become involved, as appropriate.

The Program will publish a remediation process on the program website to describe what actions could be taken when deficiencies or unfair business practices are detected through the inspection process, these results are communicated to the responsible party and any remedial or punitive actions taken follow a pre-defined set of protocols. The remedies and penalties will be developed upon issuance of guidance from the DOE. In the event where financial compensation is requested by the customer, the Program Implementer will work with the Registered Contractor to determine if such compensation is warranted. If it is, the registered contractor should offer to pay a reasonable fee for repair and/or replacement of the improperly installed or damaged goods. To determine the amount of the fee the Registered Contractor may propose an amount, ask the customer for an amount or ask the customer to submit an estimate for the work. Ultimately, the Program Implementer, Registered Contractor and the customer must agree to the amount of reimbursement.

Conflict/Incident Documentation Procedures

All incidents and complaints, including health and safety complaints, will be recorded on the Registered Contractor account in the database of record. The initial entry will include:

- The date of initial complaint/incident
- Customer name and account number in database of record
- Program
- Form of complaint (in person, letter, email, phone call, help desk)
- A detailed description of the complaint/incident
- Action taken
- Date of resolution

The Implementer will document all communications between parties in the database of record.

Periodic review

Documented conflicts and incidents involving registered contractors will be reviewed at minimum once per quarter. Findings will be delivered to the Program Implementer by the Administrator. The Implementer will be required to review the Administrator's findings and provide a recommended course of action. Once approved, the Program Implementer will meet with the registered contractor to implement the action.

During quarterly reviews all documented conflicts logged in the database of record will be reviewed to determine trends and systemic issues. Registered contractors who are found to have 2 or more complaints in a rolling 12-month period may face disciplinary action from the program, or may be asked to take corrective actions to ensure complaints do not persist. Disciplinary action may include but is not limited to: the program may issue a warning to the registered contractor per the program's "Participation Agreement" the program may require the registered contractor to agree to additional field inspections (QC) for a prescribed period time, provide additional data when submitting application, or they may be delisted.

The Program will reserve the right to determine if corrective or disciplinary action is warranted based on the circumstances of individual complaints and the documented outcome.

Quality Control (QC) Inspections

The Program Implementer will be required to maintain records generated from QC inspections for a period of six years. Data points that must be retained include:

- Sampling rates (overall)
- Findings (per QC)
- Corrective actions taken if any
- Verification of conformance to program requirements (per QC)

Arbitration and Holder in Due Course Rule

No contracts may include a mandatory arbitration clause. Registered Contractors may not require mandatory arbitration for any issues or incidents that arise in connection with IRA Home Energy Rebate work.

Per the Holder in Due Course Rule consumers have the right to assert the same legal claims and defenses against anyone who purchases the credit contract, as they would have against the seller who originally provided the credit.

Data review

Each rebate application will go through an approval workflow prior to payment. The approval workflow will be composed of reviewers from the entities delivering the programs, including Program Implementers and Administrator staff.

The application approval workflow reviewers will consist of experience staff trained on the program participation and eligibility requirements, measure eligibility and requirements, and proper documentation and data needs. Reviewers will have an understanding of residential energy efficiency technologies and practices. Trainings will focus on HOMES program policies and procedures, application review standards, training on the IT systems they will work with, and data review procedures. Checklists with all required data points and review criteria, guides, and tools will be provided to aid in the approval process.

Data collected will be maintained for 6 years from the project completion date.

Program Implementers will review and confirm, at a minimum, the following information for accuracy:

- Auditing tools and modeling software are on the list of the contractor's approved tools. A copy of the customer's reports will be required as part of the application documentation, if available.
- Copy of the home assessment report. A checklist with the home assessment requirements will be created and shared with application reviews. The checklist will cover:
 - Recommendation of properly sized unit by a HVAC Registered Contractor.
 - Onsite visual inspection of the existing conditions of HVAC duct sealing and envelope.

- Estimate of utility bill impacts, along with written acknowledgement by the consumer, under the following situations:
 - if upgrade includes fuel switching.
 - if the upgrade falls within one of the State’s pre-defined set of home pre-conditions and/or the scope of work scenarios that will constitute unacceptable risk of raising utility bills. This includes but is not limited to the following:
 - Uninsulated home converting from natural gas to electric heating system.
 - Installation of equipment that is improperly sized for the home.
 - home within a region where electric rates are significantly higher than gas rates.
- Written acknowledgement from the consumer of the amount owed that is not covered by the rebates.
- Collection of the following data points and accurate entry in reporting and tracking system:
 - Unique home identifier (address).
 - Dwelling type.
 - Existing energy equipment/systems to be replaced, if any.
 - New energy equipment/systems proposed for installation.
 - Estimated total project cost. The total cost of all upgrades within a completed project invoice inclusive of any rebated amount.
 - All other datapoints listed as required in the Data & Tools Requirement Guide.
- Review of proposal and/or contract and invoice.
 - Scope of work is the same.
 - Same installation address on documentation, matches any reservation or rebate coupons issued for project.
- Scope of work meets program requirements.
- Project installation within a building that is not considered new construction.
- Rebate aligns with verified income category.

The Program Implementer will issue the post-installation certificate to the household upon review and approval of the rebate application. A copy of the certificate will be uploaded to the reporting and tracking system. At this point, the application will advance in the workflow for Administrator review and approval.

In addition to spot checking the information reviewed by the Implementer, the following items will be included as part of the Administrator review and approval:

- Verification that the following application documents are uploaded and accurate:
 - Post-installation photos of major upgrades for each application. Reviewers will follow provided guidance to confirm the integrity and validity of the photos. Guidance may include auditing a sample of the photos, using AI to prove photo is unique to the specific project and address, or analyzing meta data, as identified by upcoming guidance from DOE.
 - Proof of combustion safely testing on fossil fuel equipment in homes where fossil fuel systems were impacted by the installation of new equipment.
 - Proof of commissioning testing on HVAC equipment in all homes where new HVAC systems were installed as part of the project.
- Installation details, including site address and customer name, match the information listed on rebate reservations forms

Home Assessment Data Review

Our program's Quality Assurance (QA) and Quality Control (QC) protocols will include the following elements to assess accuracy:

- Approved assessment and data collection tools will be required to include data validation checks and constraints to minimize data entry mistakes. These basic checks will be on both the input and the output side.
- Every project submitted for rebates will include a desk review by our Implementer. The Implementer will record irregularities and resolve issues with the Registered Contractor as needed.
- Should a Registered Contractor appear to consistently report extremely poor baselines inconsistent with the targeted housing stock, the Implementer will follow-up with calls to the households served by the Registered Contractor to better understand the households' perspectives of the work performed and outcomes.
- Registered Contractors who are flagged due to data collection anomalies or concerns (where found in no more than 25% of their projects) will be required to take additional training on conducting assessments to learn best practices.

Quality Control (QC) Inspections

The Implementer will be required to maintain records generated from QC inspections for a period of six years. Data points that must be retained include:

- Sampling rates (overall)
- Findings (per QC)
- Corrective actions taken if any
- Verification of conformance to program requirements (per QC)

Onsite Inspections

The first five (5) projects of each registered contractor will undergo a post-installation inspection. Registered contractors that are current Focus on Energy Trade Allies already receiving post-installation QC visits will be exempt from this first five requirement. If issues are identified with the first five projects, an inspection will be required of the contractor's projects on a continuous basis until either five consecutive inspections are completed with no issues, or the Implementer has determined that ongoing issues with the installation have been resolved.

Upon the successful completion of the five post-installation inspections, a minimum of five percent (5%) of each Registered Contractor's projects moving forward will be inspected. A higher percentage of projects may be inspected if issues are identified during an inspection. Projects selected for inspection will be tracked within the program's tracking and reporting system and Excel spreadsheets, if needed. Inspection details to be tracked include date of inspection, results, and corrective actions, if required. The inspection report will be uploaded to the program's reporting system.

Projects from the Home Electrification and Appliance Rebate (HEAR) program and HOMES program will be included in the project count for the first five and ongoing 5% requirements for Registered Contractors.

Inspectors will be part of the core implementation contractor's team, trained on all aspects of the program requirements. Inspectors will be certified by the Building Performance Institute (BPI) with a minimum certification of Building Analyst Technician (BA-T). TREC funding will not be used for the training of inspectors.

Inspection protocols will be documented and provided to all inspectors. Acceptable tools and/or templates for capturing data and photos will be identified and inspectors will receive training on proper use of them. Copies of the inspection reports will be uploaded to the tracking and reporting system. The inspection protocol will include:

- Visual inspection of the site and work conditions.
- Review of the scope of work/contract and invoice to verify that the installed measures match the contracted scope of work.
- Valid customer signature on the contract. E-Sign compliance for electronic contracts.
- Timestamped and geolocated photos of the installed equipment. If timestamped photos and geolocated photos are not available, an exterior photo of the building showing the house number/address will be required, in addition to the photos of the installation and equipment. Required photos will vary based on project type.
- Verification of the diagnostic tests, if applicable. This may be completed either by observing the Registered Contractor's testing or inspector testing.

Registered Contractors and other Partners

Contractor Registration and Listing

Businesses who wish to offer HOMES rebates to their customers must be listed on the Registered Contractors list. To be eligible for listing, the contractor must hold current business insurance, active home performance industry credentials relevant to the services being provided (eg. BPI certification), a state license or must register with the state (when applicable). The program will review all documentation and confirm accuracy using publicly available tools and databases when possible. For example, BPI certification can be confirmed by performing a search using the [BPI 'Find a Contractor' tool](#) available on the BPI website; state license numbers can be confirmed using the [Wisconsin Credential/License Search](#) available on the Wisconsin Department of Safety and Professional Services website. The state will continuously evaluate methods of verifying credentials and implement those methods when identified.

The program will develop and publish a Registered Contractor registration application. The application will be used to collect contact information, office or warehouse address, payment data and supporting documents from contractors who would like to offer IRA Home Energy Rebates to their customers. Parties interested in being listed on the Registered Contractors list will be required to complete the registration form, agree to the Participation Agreement, and submit all required documentation as specified on the application.

Specific credentials and required trainings will be determined prior to the Registered Contractor registration application going live. The application will detail all acceptable credentials and documents that will be required for different trade groups. The program will also provide registration details including a link to the application and Participation Agreement, and a list of all required credentials and documentation, to the current Focus on Energy Trade Ally network via email prior to program launch.

Documentation must include:

- Proof of business insurance.
- Proof of state license, if applicable.
- Proof the business is registered with the State of Wisconsin.
- Proof of successful completion of approved training, when applicable
- W9.
- Certificate of insurance showing current general liability or equivalent coverage.

Implementer will review registration applications within 2 business days of receipt. During application review the program will verify documentation as described above, confirm all required fields have been completed, confirm the applicant is either not registered or is a current Focus on Energy Trade Ally in good standing, and confirm that the business does not appear on the Department of Treasury's [Do Not Pay list](#). An application may be returned or rejected if it is missing any information or if the Program requires clarification on any fields.

Once an application is approved the Registered Contractor will be listed on the IRA Home Energy Rebates Find a Registered Contractor Tool located on the Program's website.

Focus on Energy does not currently require a W9, state license, or insurance documentation to be on file for all Trade Allies. Additionally, not all Focus on Energy Trade Allies will wish to offer IRA Home Energy

Rebates to their customers. Therefore, to ensure the integrity of the list and contractor network, all businesses who wish to offer IRA Home Energy Rebates will be required to complete the registration application. This includes current and former Focus on Energy Trade Allies, registered retailers, and distributors.

Projects completed by contractors who are not registered are not eligible to receive HOMES Rebates.

Registered Contractors may choose to withdraw from the IRA Home Energy Rebates Program at any time by notifying the program in writing. Implementer must notify the Program Administrator of a Registered Contractor's withdrawal request. Implementer staff must also update the business' account to reflect they do not offer IRA Home Energy Rebate programs in the database of record within 1 business day. In addition, the Implementer will note and upload the withdrawal request to the account. Once the Administrator received the notification the account will be reviewed to ensure the proper changes have been made. The Registered Contractor will subsequently be removed from the list (delisted). Removal from the list in these circumstances will take no longer than 3 business days. All documentation provided by the former Registered Contractor will remain in the database of record.

Contractors Trained Under IRA 50123

The Wisconsin Training for Residential Contractors (TREC) program, as established through IRA Section 50123, anticipates a program design with DOE approved training and certifications for the following job sectors: Energy Auditors, HVAC Contractors, Plumbers, Electricians, and Home Performance Contractors. These trainings and certifications will meet DOE requirements established in IRA Section 50123, with the intent that these trained workers will assist in implementation of IRA Home Energy Rebate program projects across the state. The Wisconsin TREC program will recruit new and current contractors into training and certification programs. Contractors who successfully complete training as part of IRA Section 50123 funding will become eligible to be listed on the Registered Contractor list upon completion, however, the contractor will still need to register their business and agree to the Participation Agreement.

Delisting

Registered Contractors can be removed from the Registered Contractors list for:

- Failing to adhere to Program requirements (ie. Failing to adhere to the Participation Agreement).
- Failing to adhere to the conflict resolution process.
- Receiving multiple customer complaints for the same issue and failing to take corrective action once the issue is identified.
- Any other reason the Program deems necessary.

Ramifications for non-compliance with areas above:

- First confirmed offense – written warning, notice to cure.
- Second confirmed offense – indefinite suspension from all IRA Home Energy Rebate programs and removal from Registered Contractor list.

The full procedure will be in Participation Agreement.

Tools and resources

Prior to launch, the Program will publish a list of approved tools (eg. Modeling tools, home assessment tools or software) and job aids on the Program website. The Program will adhere to requirements according to statute.

Post registration, the Registered Contractor will be contacted by the program to explain allowable tools relevant to the Registered Contractor's services offered and provide information on training available.

Installation

The State of Wisconsin will provide guidance and direction to installing Registered Contractors for completion of quality installations that meet industry standards, including ensuring they comply with local and state laws, permits, and codes. The State will follow standards developed and vetted by industry experts, including ENERGY STAR®, Air Conditioning Contractors of America (ACCA), and National Renewable Energy Laboratory (NREL). The guidance will address correct design, proper installation, and final testing of the equipment per project type. The guidance will be available on the HER programs webpage prior to program launch.

The State of Wisconsin will include language within the Registered Contractor registration application stating the contractor must comply with all applicable laws, ordinances, regulations, and codes regarding the installation of the equipment.

Registered Contractors must ensure that sales language and contract language are the same.

The scope of work provided to the customer will be a detailed listing of the home improvement measures. The scope of work will specify equipment recommendations and include the installation requirements and conditions. The scope of work should also indicate the optimal completion order of the measures to maximize energy savings.

Installation of the measures will be completed in an order that prevents potential ensuing defects and maximizes energy savings. Equipment and materials must be installed according to the manufacturers' installation instructions. Materials and installation methods will be consistent with a building science-based approach to maximize savings, minimize indoor air quality problems, minimize moisture accumulation, and ensure maximum operating capacities of the installed equipment.

Registered Contractors will complete a Quality Assurance (QA) review of each project. Depending on the scope of work, the QA requirements may include a visual inspection, commissioning of the system, diagnostic testing, and combustion safety testing. The Registered Contractor will provide the QA documentation as part of the application, including photos of the installed equipment and materials.

Projects involving HVAC upgrades

Projects involving HVAC equipment assume that HVAC equipment and components are in new, factory clean condition. Contractors will ensure that the HVAC design will include ventilation and heat gain/loss load calculations, proper equipment sizing, and that indoor and outdoor equipment components are properly matched. During the installation, all applicable testing shall be completed, which may include airflow, electrical requirements, combustion venting, and proper functioning of system controls. The contractor will provide system documentation and educational support to the customer. This may include owner's manuals, warranty and service agreement information, maintenance plans, and recommended system settings.

Financing Considerations

If financing for the energy efficiency upgrade is provided to the property owner by the Registered Contractor, a written disclosure listing the number of payments, monthly payment amount, late fees, and other important payment terms is required. The Registered Contractor must ensure an ability to repay determination that does not include projected savings from an energy report because expected savings may not materialize due to household and market developments.

This disclosure must be provided to the customer in advance of contract signing, with a 7-day waiting period between disclosure and contract signing. The waiting period should only be removed in an emergency, in which the property owner, in their own handwriting, explains the emergency and the need for emergency work, and states they understand they are waiving the waiting period. In non-emergency situations, there should be at least a three (3) day window after the contract is signed and before work begins, in which the property owner has the right to cancel the contract.

Continuous Improvement

Preventing Waste, Fraud, and Abuse

The state is committed to preventing all instances of waste, fraud, and abuse. To prevent these issues from occurring Program staff will review all rebate applications to ensure they meet acceptable standards. As such, the State will take the following steps to identify, mitigate, and reduce fraud, waste, or abuse, as well as unfair business practices.

The state will require desk review Quality Control (QC) at all stages of payment approval to check for fraud, data integrity, and accuracy. At minimum the reviewer will check for duplicate submissions, duplicate addresses, all required documentation is present and complete, that the installing contractor is on the Registered Contractors list, and payments are being made to the correct entity. The state will create a desk review QC guide outlining QC best practices and review requirements. The best practice guide will be reviewed on a biannual basis to ensure the requirements are relevant to the current state of the program.

The state will identify opportunities to verify the legitimacy of contractors before adding them to the Registered Contractor list. The registration review will include checking the U.S. Department of Treasury Do Not Pay system to confirm the contractor is not listed. Appropriate business registries will be consulted to confirm the validity of the business and its address. The state will identify relevant state databases that could be utilized to verify the existence of the business and formal complaints against the business that involve fraud.

Households that use self-attestation as their method of income verification will consent to grant access to the Program to review the household's tax records to ensure income eligibility requirements were properly followed. Self-attestation will only be allowed in situations in which the household experiences an emergency and needs immediate replacement of HVAC equipment.

The Public Service Commission also has established processes to refer items to different state agencies depending on the issue. For payment default issues, the Commission can refer items to the Wisconsin Department of Justice (DOJ) and in the past has worked with the Wisconsin Department of Revenue (DOR) when an individual or entity has defaulted on a loan and entered into a collection's agreement.

For consumer protections issues, such as business misrepresentation or fraud, the Commission can refer these matters to the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP). Consumers can also file a complaint directly with DATCP. The Commission also has an internal complaint process under Wis. Admin. Code chs. PSC 113 and 134 for consumers to file complaints and request a formal review process.

Protecting against artificial cost inflation

To ensure Registered Contractor costs are not artificially inflated, each quarter the state will randomly sample 25% of invoices submitted to compare costs. To establish an average cost the State will review costs of invoices submitted to the IRA Home Energy Rebate programs, historical Focus on Energy costs when applicable, and average costs provided by relevant state agencies.

If some Registered Contractors' costs are consistently higher than others within the same geographical regions of the state, the Implementer will be required to issue a written warning to the Registered Contractor and require them to substantiate their costs within 30 calendar days of receipt.

The Implementer will review the Registered Contractor's response and either accept the Registered Contractor's reasoning or provide a recommended course of action to the contractor within 14 business days. The recommended course of action will be determined by the Implementer. The course of action can include, but is not limited to, a requirement to provide justification for higher-than-average costs for an appropriate length of time to be determined by the Implementer or having more than 5% of the Registered Contractor's projects reviewed for a period of time determined by the Implementer. If the Registered Contractor fails to adhere to the terms of the course of action, the Implementer and the State may take action to remove the Registered Contractor from the Registered Contractor list.

During the review period the Registered Contractor may still perform work for the Program. All the Registered Contractor's applications will be subject to a desk review during the review period. Costs will be closely monitored and noted during this period.

All communications will be documented on the Registered Contractor's account in the database of record.

Registered Contractors can appeal the Implementers recommended course of action. In the event of an appeal the Implementer will review the case with the Administrator. The State may either uphold or amend the Implementer's recommended course of action.

Automation

The state will develop a plan to review all functions that can be automated and analyze steps needed to incorporate efficiencies within the program procedures and systems.

Evaluating QA Systems

The state will continuously evaluate the efficiency of all QA systems and processes. The state will make updates when process improvements are discovered and tested.

Budget and Financial Evaluation (Roles and responsibilities)

Budget details will be provided as part of the final DOE application submission.

Attachment 4

Education and Outreach Plan

State of Wisconsin Home Energy Rebates Home Efficiency Rebate (HOMES) Program

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Introduction

The foundation for a positive consumer experience lies in effective outreach and education regarding the benefits of the IRA Home Energy Rebate programs. Focus on Energy (Focus) was chosen to administer the Wisconsin program because of the structure already in place to reach most of Wisconsin’s residential customers. Focus on Energy has a successful communication platform already in place, i.e. website, newsletters, support channels, etc. Focus is also able to start with an engaged group of contractors, partners, and potential participants and will be able to share information on rebates that can be stacked on top of the Home Energy Rebates for participants. This may include additional rebates or services through the Department of Administration’s Division of Energy, Housing and Community Resources (DEHCR) Home Energy Plus program, Focus on Energy, tax credits and other utility incentive programs.

Focus on Energy will utilize outreach efforts to cross promote both the Home Efficiency Rebates (HOMES) and Home Electrification and Appliance Rebates (HEAR) programs as much as possible and where appropriate, depending on the communication tactic and message.

Contractor Outreach

Contractor participation and understanding of the Home Efficiency Rebates program is critical for success. During the first 12-18 months after program launch there will be a heavy focus on contractor education and outreach. The State of Wisconsin (The State) does not believe recruitment efforts will need to be a large focus of initial outreach efforts. It will be important to be clear on what contractor expectations are if they are to deliver programs to participants. Naturally, outreach will begin with the

existing Focus on Energy Trade Ally network. Any Registered Contractor for the IRA program will need to sign up to participate in the Home Efficiency Rebates program, regardless if they are already a Focus on Energy Trade Ally. Contractors will have to agree to meet all Focus on Energy Trade Ally qualifications, agree to the IRA Code of Conduct, and provide any additional documentation the program requires for participation. Approval is estimated to take approximately two business days. Once participation is confirmed, the bulk of communication and interactions with contractors will be related to how to work through the steps of the program, making these steps easy for them to understand, and how to talk about the program to participants. Contractors can always reach program staff through a dedicated IRA email address, Focus on Energy phone number, or sign up through our online application (currently part of our Trade Ally website).

The following is a list of anticipated tactics that will be part of program outreach deliverables.

- Email – one way to reach contractors with program information is via email. Email will be a primary way to target participating contractors and share program updates, tips, information, success stories, etc. with them.
- Direct outreach – while it is nice to have documentation of information, the best interaction is an actual conversation. Focus on Energy has the benefit of an implementer dedicated to program Trade Allies. Focus implementers have Energy Advisors who are the primary point of contact for contractors. The program intends to use them to engage and have regular contact with contractors. This outreach may be either through in-person visits, phone calls, and email.
- Website Resources – Currently, Focus on Energy has a Trade Ally section on their website. This will be utilized as a central location of resources for IRA Registered Contractors as well. Not only will program details be available, but also helpful speaking points or suggestions on explaining program or technology details to participants. Registered Contractors can also use the Focus on Energy logo to promote the program and co-branding ads may be available for use.
 - All IRA Registered Contractors will be listed on the program website so potential participants are able to see who they can work with to deliver program benefits.
- Video – there are many opportunities to use short videos to provide directions to contractors that will make their program participation easier. Focus on Energy calls these “explainer” videos, and many find them helpful in ways we use them today. From walking contractors through income eligibility, forms/documentation, or a new payment submission/look up tool, a short video may be more helpful or used to compliment written directions. These videos can be found on the dedicated Trade Ally webpages noted earlier and featured in regular email communications.
- Collateral – While a vast amount of printed collateral is not believed to be needed, sometimes a piece of paper to walk a program participant through the program steps, qualification, and benefits is needed. This would be a flyer or program fact sheet explaining the program and their participation. It might also be something distributors use to go over the program with their contractors.
- Social media – In the event that additional IRA Registered Contractors will need to be recruited, The State of Wisconsin can utilize existing email lists and cross reference them with LinkedIn or Facebook outlets and run targeted ads.
- Annual events – Each year, Focus on Energy or participating utilities host in-person, Trade Ally meetings where new program information is shared, feedback is gathered, and networking can

occur. Updated IRA program info can also be shared at these meetings to either highlight benefits of participation, communicate any changes, or additional offerings available.

- Partnerships

- Distributors - Focus on Energy currently has relationships with many distributors in the state through its existing Midstream and Instant Discount Programs. To start, targeted outreach to selected existing Focus on Energy distributors related to delivery of the Home Efficiency Rebates program will be used. These distributors are listed below. Using distributors for their close interaction with contractors may help reach organizations that had not been previously. Interaction may include presenting IRA program information at meetings, through newsletter communications, other touch points already in place. New distributors will be targeted for inclusion in these programs as well, as identified during program planning. Some of those we initially intend to work with, and already having relationships with through Focus on Energy programs, are listed below.

- Design Air
- Gustave A. Larson
- Auer Steel
- Ferguson East
- Ferguson West
- First Supply
- Temperature Systems, Inc.
- Mid-State Supply
- Stevens Equipment Supply

- Weatherization agencies – Weatherization agencies will be an important partner, as their program and IRA Home Energy Rebate programs both target an income-based audience. In many cases, to have the customer maximize benefits, there will need to be coordination between federal programs benefits. If a Weatherization Contractor is already in a home, they can also install complementary IRA measures. These agencies may also be a resource if they are unable to retrofit all homes in need in particular high-energy burden communities or if homes do not qualify for Weatherization programs, but still need help, can be referred to IRA programs. For this to occur, additional training will also need to be provided.

- Licensed Entities – Current home programs in Wisconsin already partner with several types of contractors. One of the benefits of IRA Home Efficiency Rebates are additional home improvement measures that we may not have been able to improve before through existing Focus on Energy programs. An example is electrical panel upgrades. The State will be reaching out to the Wisconsin Chapter of the National Electrical Contractors Association (NECA) for partnerships. Other associations to engage might include Plumbing, Heating, Cooling Contractors of Wisconsin, IBEW Locals, LiUNA Wisconsin Laborer’s District Council, or BlueGreen Alliance. The State will also be working with Wisconsin’s Department of Safety and Professional Services to get participating members of a variety of licensed trade entities. These are also organizations that can be engaged with through sponsorship/advertising opportunities if needed.

Once the early program stage passes, focus may need to change to recruiting IRA Home Efficiency Rebate Registered Contractors, especially in certain areas of the state. Email blasts, social media ads, professional organization marketing, manufacturer presentations, and direct outreach are all examples of more formal marketing efforts that may be needed.

Since these tactics focus more on businesses, they may also be relevant avenues to reach multifamily owners. General outreach for multifamily opportunities will be limited. However, many of the education tactics listed above can still be relevant. We believe building owners/managers would benefit most from direct or targeted outreach. In partnership with WHEDA, we will be able to secure a list of targeted multifamily contacts. This list can also include those properties that qualify for Section 8 housing, which will greatly benefit income qualified tenants. Statewide and regional multifamily associations may also be partners to reaching this audience through utilizing their meetings and newsletters.

Current Focus on Energy partners and Trade Allies will be communicated with first through existing outreach channels. They are always able to reach the program through our dedicated IRA email and Focus on Energy phone numbers.

Household Outreach

While contractor participation is essential, no projects would be complete without a program participant. For the launch period and 12-18 months after, the priority will be on making sure to educate the participant on the program process and ensuring they have a positive customer journey. To make sure of this, the intent is to have plenty of contractors in place and ready to go so customers do not experience long wait periods or Trade Ally confusion. If participant recruitment is necessary, it may be targeted in certain areas of the state with higher contractor capacity, those with higher energy burden, disadvantages communities, or those households with the potential to deliver the greatest program savings. While the program is statewide, broad mass media efforts are thought to be a misdirected use of available funding. Efforts will be placed more on consumer education of program benefits, matching participants to program partners or resources, how to efficiently navigate the program's customer journey, and how to successfully use/maintain their purchased home upgrades. While most of the education and outreach efforts below can be used for all eligible participants, there will be opportunities to target certain demographics. Priority of targeted households will be to single family homeowners in disadvantaged communities, identified through counties, zip codes, or public assistance participant lists, in areas of the state where we know contractor capacity or product availability is known.

The following is a list of anticipated tactics that will be part of our program outreach and education deliverables.

- Email – Email will be used to share updates with residents about launch, program onboarding, tips, etc. Not only were emails collected from those that registered to get more information, Focus on Energy, Wisconsin utilities, etc. there are several partner organizations with regular newsletters that would allow HOMES to have an article.
- Partnerships – Direct outreach is typically not feasible to reach a broad participant audience. We have several cities/municipalities, advocacy groups, and Community-Based organizations are clamoring for information. Not only has Focus on Energy and The State of Wisconsin been invited to speak already before programs launch, also it is expected these invites will continue, allowing the program to engage smaller groups to share program information and benefits.

Many of these groups feel HOMES is an important program for their area and will also be doing outreach on The State's behalf. Use of existing newsletters, email lists, public information sessions/events, and helping participants find trusted contractors in their area, and other outreach or education tactics that these groups find their community benefits from. Having like-minded people that are trusted share program information is invaluable.

- Full detail on these Community Based Partnerships can be found in the Community Benefits Plan. However, the program hopes to initially partner with at least 10 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and refer eligible households to participate.
- Program outreach to these groups will vary, but the majority will most likely be one-on-one meetings.
- An example list of some, but not all community stakeholders that Wisconsin will engage are listed below.
 - Wisconsin Local Government Climate Coalition
 - Focus on Energy Partnered Community-Based Organizations
 - Vernon County Energy District
 - DNR Green Tier Legacy Communities
 - Reclaiming Our Neighborhoods (RON) Coalition (Milwaukee)
 - Sheboygan Housing Coalition
 - UMOS (Milwaukee), Centro Hispano (Milwaukee & Dane Counties), Wi EcoLatinos (Dane, Rock, & Columbia Counties), Dane County Latino Academy of Workforce Development
 - Hmong American Partnership (Appleton) and Hmong American Center (Wausau)
 - 16th Street Community Health Center (Milwaukee)
 - Habitat for Humanity (chapters across the state) & Revitalize Milwaukee
 - Walnut Way / Lindsay Heights Neighborhood Improvement District, Sherman Park ECO Neighborhood, Northwest Side Community Development Corporation, and Citizens Action WI
 - Blacks for Political and Social Action
- Website – Currently, The State of Wisconsin is driving everyone to the Focus on Energy IRA Home Energy Rebates Program webpages to get the most up to date information. Centralization of resources is important for ease of updating and it allows people to know they can always go to the site for reliable and current information. As noted in the partnership tactic, not only are many third-party organizations working on The State's behalf, having a place where they can get information, so our message is consistent is very important. Process, technology specific pages, income qualification calculator, rebate stacking of Focus on Energy/IRA, Registered Contractors, blogs, and videos are all things that may be available on the website for participant education. The program phone number and dedicated email address will also be listed on the website for any additional needs or questions.
- Video – there are several opportunities to use short videos to briefly explain a complicated program. Simple pieces of information can be broken down and explained to people that might help them walk through income eligibility, technologies they have not heard of, or even how you model a home. To some, a short video may be more helpful or used to compliment written

directions. Videos may be found on program websites, but also highlighted in program emails or social media calling people to the available resource.

- Collateral – While a vast amount of printed collateral is not believed to be needed, there may be some materials used to give more detail on qualifying HOMES energy saving measures and process. Collateral may include program process fact sheets, flyers/cards directing participants to the website for current information, resources, or information on common equipment upgrades. In some instances, there may be opportunities for co-branding opportunities with local municipalities, utilities, or community partners.
- Social media – Being able to share program information/updates on a social platform will be helpful to drive people to videos or other web resources. Based on participant income qualification, targeted ads will be run by zip codes relating to those likely to qualify for program standards. Social platforms that may be utilized are Facebook and Instagram.
- PR/Media – traditional media has been interested and responsive to content related to IRA programs. Based on relationships, The State is hopeful to get re-occurring spots on newscasts, radio sponsorships on Wisconsin Public Radio and Spanish-speaking radio stations in the state. It is unlikely budget will be set aside for traditional paid media advertising and focus would be on earned media or specific sponsorship opportunities that can demonstrate reach to targeted audiences.

Many of the education and outreach tactics listed above will be relevant in multifamily situations as tenants or recipients of owner program participation will need to know how to encourage their owner/manager to participate, explain benefits of upgrades, and how to operate their upgraded equipment or efficiency upgrades.

Current Focus on Energy outreach channels will be a significant help to engaging with a group that is already interested or aware in energy efficiency. Communication through the various channels listed above will also allow sharing information on opportunities to utilize incentive opportunities available through non-federal funds and grants, such as Focus on Energy.

Timeline

The tactics listed above for both contractor and household outreach will be relevant during launch/early program (12-18 months) and the remaining years of the program. This should be approximately summer 2024-2025. Messaging or concentration of efforts might change and initially IRA Registered Contractor focus will be heavier than households to make sure the market is ready, and participants have a smooth customer journey through the program. A proposed timeline of education and outreach is below.

Table 1: Proposed Timeline

	2024		2025				2026			
	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Contractor Tactics										
Email										
Direct Outreach										
Website Resources										
Video										
Collateral										
Social Media										
Annual Events										
Partnership Outreach										
Household Tactics										
Email										
Partnership Outreach										
Website Resources										
Video										
Collateral										
Social Media										
Media										

Estimated Budget

Budget details will be provided as part of the final DOE application submission.

Attachment 5

Utility Data Access Plan

State of Wisconsin Home Energy Rebates Home Efficiency Rebate (HOMES) Program

The State of Wisconsin selects option A2. Opt-In: Direct Utility Data Provision and Section A3. Opt-In: Residents/Owners. The sections below describe those options along with answers to the DOE questions on these options. DOE provided information is italicized.

Section A2. Opt-In: Direct Utility Data Provision

Pathway Background

In this pathway, states work directly with utilities to collect energy consumption data based on a customized approach to transfer data so that data is made available to program implementers, contractors, and/or aggregators.

There are multiple ways that a state may work effectively with utilities located in their state including:

- Coordinate directly with utilities on multiple program aspects, including program implementation, braiding of program resources, and energy consumption sharing.
- Create data sharing agreements with utilities, including memorandum of understanding or other such agreement based on the abilities of utilities to transfer participating customer data for the program. States may want to consider creating financial incentives for utilities to balance the effort and time required to share the data and increase the benefits for customers from more detailed data access.¹
- If relevant, work with regulators to require utilities to provide data to the state program and also receive cost recovery for the effort required.

For individually-metered multifamily properties, states could work out a special arrangement with utilities to conduct the whole-building aggregation in order to meet the opt-in provisions. Additionally, utilities may support the states by providing Geographic Aggregation data for pre-participation targeting purposes, see [Section C](#).

¹ DOE recommends that States reach out to utilities' contacts in government affairs, energy efficiency, or retail procurement. Most retail procurement teams at utilities have experience providing usage data to third parties.

Table 1. Opt-In: Utility Pathway Summary

<i>Advantages</i>	Utility provision of data is lower cost than some other pathways. This pathway allows utilities to control the costs of implementation. It requires customizable formats and protocols so that data can be tailored to the goals of the state, provided they meet minimum DOE Requirements. This pathway is easy for customers and avoids the need to monitor third parties on behalf of customers.
<i>Challenges</i>	One challenge with utility provision of data is that it requires states and utilities to collaborate to share data, which may be difficult given the number of utilities and existing relationships between entities in the state. Another challenge is lack of established protocols, which is exacerbated if a state has multiple utilities with which to work on the program. Data is unlikely to be provided in a consistent, standardized format, making it harder for third parties and government bodies to review or aggregate on a statewide basis. Third-party innovation may be minimized by the utilities' control of the data. The level of detail or frequency is likely to be updated less frequently than other pathways.
<i>Home Efficiency Rebates Program Consideration</i>	For both Section 50121 (Measured and Modeled) programs, this pathway provides Evaluation/Implementation data. Note: For multifamily properties, the Modeled program allows exception in modeling because BPI-2400 applies only to single-family homes. To support pre-participation targeting, states should also work with utilities to collect Geographic Aggregation data (See Section C).

Data Access Plan Template

[If your state plans to use an opt-in utility data pathway, please answer the following questions]

Intro and Overview of Data Access in Your State

1. Confirm your state plans to collect energy consumption data directly from utilities for at least some program options. (If no, then please refer to the general overview and pathway sections to determine correct pathway and template for completion)
 - Yes
2. Identify the Home Efficiency Rebates Program(s) that your state plans to use this pathway and home type for:
 - Modeled, Single-family
 - Modeled, Multifamily
 - Measured, Single-family
 - Measured, Multifamily
3. Identify the utilities from which your state will collect energy consumption and billing data.

The State of Wisconsin will collect energy consumption and billing data from all 120 electric utilities and 10 natural gas utilities that operate and provide services to state residents. A list and map of the utilities can be found [here](#). This list includes a broad range of utility partners (Investor-Owned Utility (IOU), municipal utilities, co-operatives, and underscores the flexible nature of the states plan to provide solutions for all potential customers across different service territories.

4. Describe any existing program activities, platforms or agreements that are in place in your state that enable the collection of data directly from utilities.

Customers participating in Focus on Energy, Wisconsin utilities' statewide program for energy efficiency and renewable energy, sign a utility authorization form¹, consenting utilities to release consumption and billing data to the program when consumption and billing data is required for an incentive application. The authorization form collects the utility customer's name, premise address(es), account number(s), meter number(s), and usage type. Focus on Energy staff email the form to the utility to acquire the utility data. Historically, utility data exchange has primarily occurred with commercial customers that complete larger, custom energy efficiency projects.

Home Energy Plus (HE+), which includes the Wisconsin Home Energy Assistance Program (WHEAP), Weatherization Assistance Program, and HE+ Program Services, has agreements in place with the state utilities to provide utility data. Customers consent to the sharing of their data as part of the enrollment application. Utility data for applicants with an open, active account with one of Wisconsin's five large investor-owned utilities (IOU) is provided via a Wisconsin Energy Fuel Information (WEFI) web services call. The WEFI web service will return all available cost and consumption and billing data for the application address and confirm electric and/or natural gas account numbers. HE+ has agreements with the non-IOU utilities to provide required utility data for applicants.

¹ [Focus on Energy Utility Customer Authorization Form](#)

5. Provide an overview of your state program's processes and entities that will gain consent, collect, transfer, and maintain the energy consumption data as provided by residents and owners. Examples of responses could include, but are not limited to:

- a. Consent will be requested of [owners and/or residents] and documented by [eligible parties e.g., program staff, home auditors] in the form of [a participation agreement].
- b. Energy consumption data will be requested from [utilities] and collected by [this system, in this format].
- c. Energy consumption data will be transferred from utilities via [this secure protocol] into the [INSERT NAME] secure system used by the [program staff, state staff, other].
- d. Energy consumption data will be maintained and stored in the [INSERT NAME] secure system and maintained by the [program staff, state staff, other].
- e. Individual energy consumption data will be provided to. [only eligible parties] in [the following instances such as for conducting the program requirements].
- f. Transfer to DOE: The [System/Process] will transfer data to DOE using the following protocols.

The State of Wisconsin will clearly communicate utility consumption and data requirements to applicants, partners, and contractors participating in the Home Efficiency Rebates program (hereinafter referred to as the HOMES program).

Wisconsin residents will be asked to provide their energy utility name(s) and account number(s) as part of the application intake process to reserve funding for their rebate, along with providing consent to program access of their utility consumption and billing data. This consent will confirm an understanding from the customer that they are authorizing the following:

- Their energy utility(s) to provide details on their account, including the past 12 months of usage and 12 months of usage post project completion.
- The utility account details provided can be shared with their selected contractor(s) and program partners, as needed.
- The utility account details can be shared with Focus on Energy to facilitate the application for applicable Focus on Energy rebates.

Energy consumption data will be requested in one of two ways. WEFI is a secure platform developed by the Wisconsin Department of Administration in conjunction with the five large investor-owned utilities to provide access to energy data for delivering energy assistance services to Wisconsin residents. The consumption and billing data for customers of these five utilities will be accessed through a WEFI web services call. Approximately 80% of customers' usage will be accessed via this method. Consumption and billing data for customers of utilities that do not utilize WEFI will be requested via phone call

or secure email. Utilities will provide the utility via email. Emails must be encrypted and/or have password-protected file attachments.

Wisconsin has a large number of energy utilities operating within the state and no law requiring utilities to provide energy data to third parties, therefore the State plans to accept the consumption and billing data in the format the utility is able to provide it in. The data will be converted to HPXML for sharing and reporting purposes.

Energy consumption and billing data will be transferred to the HOMES program implementer's system via API or STFP. The data is stored within an AWS S3 bucket with access limited to the site owner. Access to sensitive documentation (including customer utility data) will not be stored on CRM or program management system; this data will be stored within a secure S3 bucket limited to administrator access. Staff working on applications will see a link to view the document but are unable to directly access the document. Access to each customer's energy data is provided as links to the stored document(s). Access to the energy data will be provided to the following:

- The Assessor completing the energy modeling on the customer's home.
- Program staff as needed for program implementation and/or customer assistance. Systems used to deliver the program will rely on role-based permissions access to provide configurable, secure access and functionality based on user type.
- Program evaluator for program evaluation activities, including monitoring of the reliability of the models and tools.
- Focus on Energy upon the completion of the project to assist in the application for applicable rebates.

The transfer of data to the DOE is pending, dependent on the completion and functionality of an API currently in development. The decision on the protocol for data transmission to the DOE will be informed by the upcoming release of beta v3 of the API, which is being tested by Focus on Energy staff. Data transfer would entail use of the provided API or DOE-provided reporting template.

Energy consumption and billing data for multifamily properties will follow one of three paths. Each path requires the property owner to also authorize release of the utility data for common areas and/or shared building use, such as a centralized HVAC system.

- Small multifamily properties, consisting of 2-4 units, will follow the same path as single family residents. Utility data must be provided for each unit and the common areas of the building. The utility account

holders of each occupied unit must authorize the release of their utility data for program use.

- Larger multifamily buildings, consisting of 5 or more units, will be able to provide utility data via one of two methods.
 - If the property's utility is able to provide aggregated data for the property, aggregated energy data will be the preferred method of utility data. Multi-family property owner will post notice to tenants that a modeled savings project is being pursued and aggregated utility data is being collected for program use. A notification template containing all relevant terms and conditions will be provided to the property owner.
 - In situations where aggregated data is not available, utility data from TBD% of occupied units must be collected. Tenants will complete a utility release form to authorize collection of utility data in cases where the property manager is not able to access the unit's utility account or the tenant is responsible for paying the utilities.

Security and Safety of Energy Consumption Data

6. Describe how your state will ensure that any data are transferred and maintained safely and securely, using established standards. Describe:
- Encryption methods for data transfers
 - Protection of data collected and stored.
 - Protocols in place for security guidelines and data classification.
 - How the entity responsible for administering the program will notify a customer if there are data breaches or other security related events.

The State of Wisconsin will adhere to all policies and standards set by the Wisconsin Division of Enterprise Technology² for information systems and environments used in the delivery of the HOMES program as documented in the Privacy and Security Risk Assessment blueprint.

In addition, Focus on Energy has a detailed Policy Manual³ and existing procedures regarding data transfer and integrity that will be incorporated into the HOMES program manuals. New vendors, and contractors, must complete compliance training and execute the Compliance Certification before receiving access to HOMES data systems. Staff must be re-certified annually.

All involved data systems for the HOMES program have not been identified. The State of Wisconsin is planning to use Secure File Transfer Protocol (SFTP) and APIs to securely transfer data. Encryption methods will be provided upon finalization of all data tools and systems.

Wisconsin Statute 134.98⁴ details the data breach notification requirements for the State of Wisconsin. The Public Service Commission will be responsible for the coordination for reporting and communicating any confirmed data breaches to the public and/or DOE, as required. Individuals impacted by the data breach will be contacted via letter or email, notifying them of the data potentially comprised and what steps they can take to protect their information.

² <https://det.wi.gov/Pages/policies.aspx>³ [FOCUS-2024-Policy-Manual-Final.pdf \(focusonenergy.com\)](#)

⁴ <https://docs.legis.wisconsin.gov/statutes/statutes/134/98>

Consent, Notification, and Revocation Process

7. Confirm that all residents/owners will provide their consent for energy consumption data to be transferred to the state from their utility.

Yes

No. Describe the state's alternative consent approach.

Data Details and Frequency

8. Indicate the timing of energy consumption data to be collected. If multiple options are selected, indicate those use cases:

Monthly _____

Hourly _____

Daily _____

Other (specify) _____

9. Indicate the frequency for energy consumption data be collected by the program (i.e., when will data be available for the program).

At the time of program intake for each participant _____

At a set duration agreed to by the program and utility (please define duration)

Other (specify) _____

Primary and Secondary Purpose

10. Please describe the primary purpose(s) of the energy consumption data.

- Implementation and reporting data for the program.

- Please describe any other primary purposes, if applicable (e.g., building benchmarking, emissions reductions etc.).

The primary purposes of the energy consumption data are implementation, data reporting, and evaluation of the program.

11. Describe any secondary purposes² of the energy consumption data and the entities that it will be provided to. (e.g., data will be provided to third parties to offer additional services like demand response initiatives, or other state-based programs).

The energy consumption data will be provided to Focus on Energy upon either the completion or cancellation of the project to assist the customer in the pursuit of applicable rebates and other energy saving opportunities.

12. Identify if the program plans to Geographically Aggregate program data collected from utilities and provide it publicly.

No

Yes. Describe how data will be aggregated and anonymized and how it is intended to be published.

Eligibility, Oversight, and Enforcement of Third Parties

13. Describe the eligibility criteria for third parties to access energy consumption data collected from utilities (e.g., contractual agreement with the state or program implementer that requires data security and privacy).

The State will establish data security and privacy provisions to be included in contracts for all partnering entities that will have access to energy consumption and billing data.

Qualified contractors participating in the program will agree to the Participation Agreement, which will include data security and privacy provisions.

² Secondary purposes may include the use of customer data in outreach and education and additional product offerings that the customer does not already receive or has not authorized. Examples of secondary purposes may include targeted advertising for other energy equipment and sharing data with a third party for a service not included in the State program.

14. Confirm that the entities with access to energy consumption data will only use the data as approved for program purposes.

Yes

No. Describe the entities and purposes of their use of the data and how consent was obtained for these purposes.

DRAFT

Section A3. Opt-In: Residents/Owners

Pathway Background

In this pathway, the program collects data from the homeowners, tenants, or building owners directly. The program would likely request copies of metered energy consumption bills, either in paper format or electronically directly from homeowners, tenants, or multifamily building owners. There may be other innovative ways for the program to access the data, such as a third-party access of energy consumption data of program participants.

For individually metered multifamily buildings, this data collection may be especially difficult, especially for properties with a large number of units. DOE recommends using the exception path for Home Efficiency Rebates Modeled approach for these properties (See Section 3.2.4 in DOE's Program Requirements³).

Table 2. Opt-In: Owner Provision of Data or Access

<i>Advantages</i>	This pathway requires data to be collected onsite, and therefore it may have a lower cost for setup, including the protocols and agreements of previously described pathways.
<i>Challenges</i>	Data must be collected onsite, which is limited by data availability, may be time consuming, and requires a manual process for collecting and entering data, a step that is prone to user error. There is limited automation to increase efficiency over time, and new data requests require training of onsite auditors.
<i>Home Efficiency Rebates Program Considerations</i>	<p>For Section 50121- Modeled programs: For single-family homes, calibration consistent with BPI-2400 allows for energy consumption data at a monthly data or annual level, which provides flexibility in collecting data from residents/owners.</p> <p>For multifamily properties, the Modeled program allows exception in modeling because BPI-2400 applies only to single-family homes.</p> <p>For Section 50121- Measured programs: Energy consumption data will need to be collected both prior to and one year after installation.</p> <p>To support pre-participation targeting, states should attempt to work with utilities to collect Geographic Aggregation data (See Section C).</p>

³ [Home Energy Rebates Programs Requirements & Application Instructions](#)

Data Access Plan Template

[If your state plans to use an opt-in residents/owners pathway, please answer the following questions]

Intro and Overview of Data Access in Your State

1. Confirm your state plans to collect energy consumption data directly from residents/owners. (If no, then please refer to the general overview and pathway sections to determine correct pathway and template for completion)
 - Yes
2. Identify the Home Efficiency Rebates Program(s) that your state plans to use this pathway and home type for:
 - Modeled, Single-family
 - Modeled, Multifamily
 - Measured, Single-family
 - Measured, Multifamily
3. Describe any existing program activities, platforms or agreements that are in place in your state that enable the collection of data directly from owners.

Customers participating in Focus on Energy, Wisconsin utilities' statewide program for energy efficiency and renewable energy, are able to directly provide their energy consumption and billing data for projects that require this information. The Applicant's signature on an Application constitutes the Applicant's consent for its electric and/or natural gas utility to disclose the Applicant's energy usage data directly to Focus on Energy, per the Terms and Conditions of the program⁵. Historically, programmatic utility data collection has focused on commercial properties due to the nature of energy efficiency upgrades undertaken.

⁵ <https://focusonenergy.com/terms-and-conditions>

[Focus on Energy Utility Customer Authorization Form](#)

Home Energy Plus (HE+), which includes the Wisconsin Home Energy Assistance Program (WHEAP), Weatherization Assistance Program, and HE+ Program Services, has agreements in place with the state utilities to provide utility data. Customers consent to the sharing of their data as part of the enrollment application. Utility data for applicants with an open, active account with one of Wisconsin's five large investor-owned utilities (IOU) is provided via a Wisconsin Energy Fuel Information (WEFI) web services call. The WEFI web service will return all available cost and consumption and billing data for the application address and confirm electric and/or natural gas account numbers.

HE+ has agreements with the non-IOU utilities to provide required utility data for applicants.

4. Provide an overview of your state program's processes and entities that will collect, transfer, and maintain the energy consumption data as provided by residents and owners. Examples of responses could include, but are not limited to:
 - a. Consent will be requested of [owners and/or residents] and documented by [eligible parties e.g., program staff, home auditors] in the form of [a participation agreement]
 - b. Energy consumption data will be collected by [program staff, home auditors] in the form of [paper bills, access to utility bills through electronic means]
 - c. Energy consumption data will be [transferred to, uploaded] into the [INSERT NAME] secure system used by the [program staff, state staff, other]
 - d. Energy consumption data will be maintained and stored in the [INSERT NAME] secure system used by the [program staff, state staff, other].
 - e. Individual energy consumption data will be provided to [only eligible parties] in [the following instances such as for conducting the program requirements]
 - f. Transfer to DOE: The [System/Process] will transfer data to DOE using the following protocols.

The State of Wisconsin will clearly communicate utility consumption and data requirements to applicants, partners, and contractors participating in the HOMES program.

Wisconsin residents will be asked to provide their energy utility name(s) and account number(s) as part of the application intake process to reserve funding for their rebate, along with providing consent to program access of their utility consumption and billing data. This consent will confirm an understanding from the customer that they are authorizing the following:

- Their energy utility(s) to provide details on their account, including the past 12 months of usage and 12 months of usage post-project completion.
- The utility account details provided can be shared with their selected contractor(s) and program partners, as needed.
- The utility account details can be shared with Focus on Energy to facilitate the application for applicable Focus on Energy rebates.

Energy consumption data may be collected by home auditors in the form of paper bills or access of utility bills through the utility's customer service portals. Many Wisconsin utilities provide customer account portals to access account information and directly download their utility data as an .xlsx or .csv file. Several IOUs and municipal electric utilities utilize the MyMeter platform to provide this service to customers. Customers will also have the opportunity to upload their energy consumption data as part of the application intake process to reserve funding for their rebate.

Wisconsin has a large number of energy utilities operating within the state and no law requiring utilities to provide energy data to third parties, therefore the State plans to accept the consumption and billing data in the format the utility and customer is able to provide it in. The data will be converted to HPXML for sharing and reporting purposes during completion of the energy assessment and subsequent modeling.

Energy consumption and billing data will be transferred to and maintained in the HOMES program implementer's system, which is stored within AWS S3 bucket with access limited to the site owner. The data transfer will occur via API or SFTP. Access to individual energy consumption data will be provided to assessors completing the energy modeling on the customer's home, program staff as needed for program implementation and/or customer assistance, the program evaluator for program evaluation activities, and Focus on Energy throughout completion of the project to assist in the application for applicable rebates. Access to the energy data will be provided to the following:

- The Assessor completing the energy modeling on the customer's home.
- Program staff as needed for program implementation and/or customer assistance.
- Program evaluator for program evaluation activities, including monitoring of the reliability of the models and tools.
- Focus on Energy upon the completion of the project to assist in the application for applicable rebates.

The transfer of data to the DOE is pending, dependent on the completion and functionality of an API currently in development. The decision on the protocol for data transmission to the DOE will be informed by the upcoming release of beta v3 of the API, which is being tested by Focus on Energy staff.

Data transfer would entail use of the provided API or DOE-provided reporting template.

Security and Safety of Energy Consumption Data

5. Describe how your state will ensure that any data are transferred and maintained safely and securely, using established standards. Describe:

- Encryption methods for data transfers.
- Protection of data collected and stored.
- Protocols in place for security guidelines and data classification.
- How the entity responsible for administering the program will notify a customer if there are data breaches or other security related events.

The State of Wisconsin will adhere to all policies and standards set by the Wisconsin Division of Enterprise Technology⁶ for information systems and environments used in the delivery of the HOMES program as documented in the Privacy and Security Risk Assessment blueprint.

In addition, Focus on Energy has a detailed Policy and existing procedures regarding data transfer and integrity that will be incorporated into the HOMES program manuals. New vendors, and contractors, must complete compliance training and execute the Compliance Certification before receiving access to HOMES data systems. Staff must be re-certified annually.

All involved data systems for the HOMES program have not been identified. The State of Wisconsin is planning to use Secure File Transfer Protocol (SFTP) and APIs to securely transfer data. Encryption methods will be provided upon finalization of all data tools and systems.

Wisconsin Statute 134.98⁸ details the data breach notification requirements for the State of Wisconsin. The Public Service Commission will be responsible for the coordination for reporting and communicating any confirmed data breaches to the public and/or DOE, as required. Individuals impacted by the data breach will be contacted via letter or email, notifying them of the data potentially comprised and what steps they can take to protect their information.

⁶ <https://det.wi.gov/Pages/policies.aspx>

⁷ [FOCUS-2024-Policy-Manual-Final.pdf\(focusonenergy.com\)](https://www.focusonenergy.com/FOCUS-2024-Policy-Manual-Final.pdf)

⁸ <https://docs.legis.wisconsin.gov/statutes/statutes/134/98>

Consent, Notification, and Revocation Process

6. Confirm that all data will be collected from residents/owners with their consent.

Yes

No. Describe the state's alternative consent approach.

Data Details and Frequency

7. Indicate the timing of energy consumption data to be collected. If multiple options are selected, indicate those use cases:

Monthly _____

Annual _____

Other (specify) _____

8. Indicate the frequency for energy consumption data be collected by the program (i.e., when will data be available for the program).

At the time of home audit _____

12 months after program (likely for measured) _____

Other (specify) Customer can submit consumption data during application intake process when reserving funds.

Primary and Secondary Purpose

9. Please describe the primary purpose(s) of the energy consumption data.

- Implementation and reporting data for the program.
- Please describe any other primary purposes, if applicable (e.g., building benchmarking, emissions reductions etc.).

The primary purposes of the energy consumption data are implementation, data reporting, and evaluation of the program.

10. Describe any secondary purposes⁴ of the energy consumption data and the entities that it will be provided to (e.g., data will be provided to third parties to offer additional services like demand response initiatives, or other state-based programs).

⁴ Secondary purposes may include the use of customer data in outreach and education and additional product offerings that the customer does not already receive or has not authorized. Examples of secondary purposes may include targeted advertising for other energy equipment and sharing data with a third party for a service not included in the State program.

The energy consumption data will be provided to Focus on Energy upon either the completion or cancellation of the project to assist the customer in the pursuit of applicable rebates and other energy saving opportunities.

11. Identify if the program plans to Geographically Aggregate program data collected from residents/owners and provide it publicly.

No

Yes. Describe how data will be aggregated and anonymized and how it is intended to be published.

Eligibility, Oversight, and Enforcement of Third Parties

12. Describe the eligibility criteria for third parties to access energy consumption data (e.g., contractual agreement with the state or program implementer that requires data security and privacy).

The State will establish data security and privacy provisions to be included in contracts for all partnering entities that will have access to energy consumption and billing data.

Qualified contractors participating in the program will agree to the Participation Agreement, which will include data security and privacy provisions.

13. Confirm that the entities with access to energy consumption data will only use the data as approved for program purposes.

Yes

No. Describe the entities and purposes of their use of the data and how consent was obtained for these purposes.

ATTACHMENT 6

STATE OF WISCONSIN IRA HOME ELECTRIFICATION AND APPLIANCE REBATES (HEAR) PROGRAM, SECTION 50122 APPLICATION NARRATIVE DRAFT

March 25, 2024

DRAFT

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USE OF FUNDS AND REBATE ELIGIBILITY

Section 4.1.1 Use of Funds

1. Provide which types of allowable costs the state proposes within each category of **administrative funds** and **rebate funds** and within those categories:

Note: These responses should correspond with the Standard Form 424, Standard Form 424A, and [Budget Justification Workbook](#).

Please note that “rebate funds” indicate the remaining amount of grant funds after subtracting “administrative funds”.

- Program planning and design
 - The state will contract with a third-party administrator, Aptim Government Solutions LLC (Aptim), an independent evaluator, The Cadmus Group LLC (Cadmus); a fiscal agent and system administrator, Wipfli LLP (Wipfli); a compliance agent, Baker Tilly US LLP (Baker Tilly); and an income verification services firm, Energy Services, Inc. (ESI).
 - Aptim, as third-party administrator will subcontract to implementation firm(s) to perform specific functions of the program work.
 - All of these entities, with the exception of ESI are currently involved in the delivery of the Focus on Energy Program. All of these entities have expertise in designing and delivering efficiency programs, with proven success in market uptake, sound installations, income verification, and delivering benefits to low-income households.
- State Energy Office Program staff
 - The state plans to hire 2 full time staff members, with the intent that their time will be split amongst the Home Efficiency (Sec. 50121) and Home Electrification and Appliance (Sec. 50122) awards. The state’s accounting systems have the ability to separately track these different funding sources and internal policies are in place to ensure the time is accurately tracked.
 - The state also has 4 team members supporting the Focus on Energy program at the Public Service Commission of Wisconsin (PSC), these staff will also provide ongoing support for the programs in a part-time capacity.
- Development of tools and systems, including websites, applications, rebate processing, and reporting
 - The third-party administrator’s sub-contracted implementer(s) will develop user interfaces and systems for households, contractors, and others to use to apply for rebates, submit required documentation, etc., including income verification.
 - The systems administrator and fiscal agent will collaborate with the third-party administrator’s sub-contracted implementers to ensure that the data

- can flow smoothly into the system of record and to the fiscal agent system for payment.
- This work may include the development of an application programming interface (API) which would allow the efficient delivery of data related to categorical program eligibility and utility data, thereby expediting income verification and improving the customer experience.
 - Program evaluation and consumer satisfaction surveys
 - Dependent on the design of a to be developed evaluation plan, Cadmus, the program evaluator may conduct focus groups, interviews, and/or consumer surveys to assess the effectiveness of program outreach and delivery, and satisfaction with rebates and products.
 - Program monitoring and audits
 - In addition to state staff monitoring program delivery and overseeing the third-party administrator and their implementation contractor(s), the state will also contract with the compliance agent to perform this compliance work and provide assistance on responding to state or federal inquiries.
 - The third-party administrator, their sub-contracted implementation contractor(s) and other providers will also be required to fulfill data reporting and analysis per their contract.
 - Consumer protection functions including resolution procedures, data review, contractor management, installation standards, and continuous improvement.
 - In response to findings from periodic assessments of program performance (as well as any identified problems that arise throughout implementation), the state or the third-party administrator will institute changes to address deficiencies in program delivery (or design).
 - The state will develop consumer protection guides or one-pagers that will be provided to all rebate applicants as one part of the consumer protection strategy.
 - The third-party administrator and their sub-contractors will utilize Focus on Energy's existing phone system and dedicate program staff to respond to consumer questions and/or complaints. The third-party administrator may create a dedicated phone line to serve this Program which would be managed through the existing phone system.
 - State staff will regularly review the third-party administrator and sub-contracted implementers data submissions.
 - Marketing, education, and outreach.
 - The state has held five in-person and two virtual (i.e., online) community engagement sessions to better understand community interests and inform the program design.
 - The state has held eight contractor engagement sessions to better understand the interests of the state's network of trade allies and to inform program design.
 - The state will conduct separate outreach to retailers, product manufacturers and distributors.

- The state, potentially with assistance from its implementation contractors or outside experts and partners, will develop marketing and education information for homeowners, tenants, retailers, contractors, and others as needed.
 - Implementation contract cost not including rebates and costs for activities directly related to delivery of rebates.
 - The implementation contractor(s) will use administrative funds for data review and reporting, and to fulfill other programmatic management requirements.
 - The third-party administrator will provide oversight of implementation contractor(s) and other service provider costs/contract management; data review and reporting.
 - Contractor training
 - Contractor training and/or review of a contractor's certification(s) will be required before a contractor is placed on the qualified contractor list.
 - Training specifically to assist contractors in participating in the rebate program will be made available.
 - Additional training funding will exist with the TREC 50123 program which will be put out for a competitive grant program in Q3 2024 by the State Energy Office.
 - Activities to improve access to rebates, facilitating leverage of private funds and financing mechanisms (e.g., loan loss reserves, interest rate reductions) where beneficial to efficiency and/or electrification projects.
 - Depending on availability of resources, the state will collaborate with the developing Green Innovation Fund to explore the use of low- cost financing available to rebate applicants and providers (e.g., contractors).
 - Technical assistance
 - Depending on availability of resources, the state and/or its implementation contractor(s) may provide technical assistance either directly or through specialized organizations to assist entities focused on serving disadvantaged communities and/or other priorities.
2. If requesting additional rebate funds for project-related activities, describe and justify each activity and associated budget in the budget justification worksheet.

The state plans to use **rebate funds** to cover the following types of activities:

Rebates for Home Electrification Appliance Rebates (HEAR)

The state would also like to request using **rebate funds** to cover the following types of project-related activities:

- Costs for technical and customer service support performed by Community Based Organizations (CBOs) serving low-income populations.

- The State of Wisconsin proposes using rebate funds to compensate CBOs that commit to partnering with the program to support the participation of low-income households and households living in DACs. Administrative funds will be used to support the many functional requirements of program operation including; outreach and education, income-verification, data systems and tools, rebate processing, tracking and reporting, customer satisfaction surveys, consumer protection functions, compliance monitoring and audits, and evaluation. The state anticipates these administrative funds may not be sufficient to also support efficient and effective delivery of the program to those households of the state that stand to benefit most from the emerging clean energy economy: frontline communities that have the highest energy burdens and have experienced disproportionate health, environmental, and economic impacts of emissions and pollution.

Anticipated Spending Level

TBD

Description of the Proposed Work

The state anticipates releasing a Request for Qualifications to identify CBOs interested in serving as program partners. The following list describes what services the state anticipates CBOs providing to low-income households and households living in DACs to improve the efficiency and effectiveness of program delivery.

- Providing information to households about the program to guide them through the participation process and direct them toward appropriate resources. This may often be one-on-one outreach with households.
- Assisting households in selecting contractors and guiding them through the types of questions to ask contractors.
- Reviewing energy assessment reports to discuss results and options for rebates and other sources of funding assistance.
- Advise and assist a homeowner who may be navigating projects performed by multiple contractors (e.g., providing contractor lists, helping set up appointments, and understanding contractor bids).
- Assisting households through the income-verification process.
- Assisting households submitting documentation required to receive a rebate.

Justification

- The state recognizes the value of CBOs as trusted resources working on behalf of low-income households and households living in DACs.
- The state understands that CBOs will be essential to building relationships in low-income neighborhoods and DACs and in supporting efficient and effective delivery of the HEAR program to those communities that stand to benefit the most. The relationships CBOs have built up within the communities they serve can help in overcoming barriers to participation (e.g., informational barriers, decision-making barriers, transactional barriers).
- Throughout the program planning stage, stakeholders stressed the need to establish meaningful partnerships with CBOs throughout the state to help the program reach those households that stand to benefit most from its investments.
- Compensating CBOs for their time and expertise is a recognized industry best practice. A CBOs lived experience in DACs will improve the state's understanding of the barriers to participation and how the program can adapt its design and delivery appropriately throughout the program's life.
- The U.S. DOE's guidance states that it strongly encourages states to establish partnerships with and provide funding to CBOs that represent or work with underserved households to reach and engage with these communities effectively over the life of the program. The state will strive to meet the U.S. DOE's expectations and outcomes for the HEAR program. Using rebate funds to compensate CBOs for their technical and customer support services is an important component to the state's overall strategy to ensure traditionally underserved households are able to take full advantage of the program.

a. Provide the total amount of estimated administrative funds to be expended annually:

The state is expecting these funds to last approximately 5 years. Therefore, the annual administrative expenditure is calculated on that assumption.

Program	Total Allocation	Administrative Budget (20%)	Annual Expenditure
HEAR	\$74,470,200	\$14,894,040	\$2,978,808

b. Expenditure estimates for the use to rebates funds are still TBD.

Section 4.1.2 Rebate Conditions and Levels

3. Describe how the state will manage and ensure that rebate minimums and administrative maximums are adhered to over the duration of the program.

Administrative Efficiencies

The state will take a number of steps to reduce the costs of administration and project-related activities. The state plans to use [the DOE Rebate Tracking System](#) to minimize the costs of data tracking and reporting. By making use of the Tracking System's API (available to states, vendors, modeling tools, etc.), the state will dramatically reduce the need for repeated data entry and associated errors, and simultaneously ensure much greater data consistency through the use of the DOE/Pacific Northwest National Laboratory (PNNL) data specifications.

In terms of ensuring that administrative limits are maintained, the state will closely track and report spending both within this category as well as funds that are provided as rebates and as incentives to contractors. The state will also follow Generally Accepted Accounting Principles (GAAP) and conduct audits as necessary through the contractor Baker Tilly.

Rebate Funds Management

The state will use the DOE Rebate Tracking System and its accompanying coupon feature to ensure that rebate amounts comply with program requirements. Rebate applicants will only be approved for the rebate amounts (and percentages) associated with their income level (e.g., below 80% AMI) and the product type they intend to purchase (e.g., heat pump water heater, cooktop). The DOE Rebate Tracking System will include a database with records of all previously issued rebates to individual residential dwellings. In order for a coupon to be generated, the system will query the database to ensure that a rebate for that product type has not yet been redeemed for that address, and that rebate funds committed to that address do not exceed the \$14,000 cap.

The state will also use the DOE Rebate Tracking System to track the amount of rebate funds committed to date, and only approve new requests for rebates if sufficient funds remain. When the system issues a coupon, it will simultaneously put into place a "reservation" of funds (equivalent to predicted value of that coupon) that will remain in place until either the coupon is redeemed or the coupon expires, whichever is first. The state also plans to establish reserves within the DOE Rebate Tracking System to ensure that sufficient funds are in place (and maintained) for specific uses (e.g., minimum of 50% of rebate funds for low-income, with at least 10% for low-income multifamily).

4. Describe how the State will monitor contractor costs and ensure that costs are not artificially inflated compared with market averages.

For those 50122 projects where a rebate is provided to a contractor (after deduction on installation/project invoice), the contractor will be required to submit itemized invoices with labor, equipment, and material costs broken out. Every quarter, the state will randomly select a sample of 25% of invoices to compare costs. If a contractor's costs are consistently higher than others, the implementer will be required to issue a warning to the contractor, provide them with an opportunity to substantiate their costs, and take action to remove the contractor from the IRA Home Energy Rebates Registered Contractor list if not remedied. Additional details will be provided in the State's Consumer Protection Plan.

5. Provide the maximum rebate amounts that will be offered to eligible entities and eligible entity representatives if lower than the allowed amounts.

[PENDING COMMISSION DECISION] The State will use the maximum rebate amounts allowed by the federal law (as defined in Table A-1 in the Appendix).

6. Identify the allowable project costs for determining rebate levels when based on project cost.

Per the [Program Requirements & Application Instructions](#), the state will follow the maximum project costs allowed by the federal law. This includes costs associated with purchase and installations of the qualified electrification project. (THESE ARE DEFINED IN TABLE A-1 AND A-2 IN THE APPENDIX). These costs may include equipment, labor, modeling, site visits, among other costs.

7. List the documentation requirements related to project costs from residents, building owners, contractors, and/or aggregators.

For each project, each contractor or eligible entity representative (EER) must provide an invoice with the following information:

- Customer name.
- Installation address.
- Contractor name.
- Contractor address.
- Contractor phone number.
- Dates on which the work was performed.
- Date of project completion.
- Model numbers for heating, cooling, and hot water systems.

- geo-coded photos of installations that include model numbers are acceptable.
- Line-item costs of:
 - Equipment.
 - Materials.
 - Labor costs.
 - Assessment, inspections, testing, modeling, permitting (if applicable).
- The total project cost prior to the rebate.
- The total rebates the customer is eligible for including HEAR and any other rebate programs, such as Focus on Energy, utility, municipal, or other 3rd party programs.

The invoice must be signed and dated by the homeowner or building owner and must include rebates applied to the bill.

8. List the installation incentives the State will provide eligible entity representatives for each eligible product or service up to \$500 (in total).

[PENDING COMMISSION DECISION] Below are the maximum rebate amounts the state will apply. The maximum incentives proposed are simplified to reduce potential confusion in the market.

Qualifying Activity	Maximum Incentive Allowed	Maximum Incentive Proposed by State
Substantial installation located within a disadvantaged community (excludes installations of electric stoves and electric heat pump dryers) per dwelling unit	\$200	\$200
Installation of one or more electric heat pump water heaters	\$150	\$150
Installation of one or more electric heat pumps for space heating and cooling per dwelling unit – ducted	\$300	\$200
Installation of one more electric heat pumps for space heating and cooling per dwelling unit – unducted	\$200	\$200
Installation of one electric stove, cooktop, range, or oven	\$0	\$0
Installation of one electric heat pump clothes dryer	\$0	\$0

Installation of one or more electric load service center	\$150	\$150
Installation of insulation per dwelling unit	\$250	\$150
Installation of air sealing and materials to improve ventilation per dwelling unit	\$250	\$150
Installation of electric wiring per dwelling unit	\$250	\$150
Total incentive per dwelling unit	\$500	\$500

9. Describe the approach for ensuring that eligible entities will not receive multiple Federal rebates or grants for the same Qualified Electrification Project (QEP).

The state will use the [DOE Rebate Tracking System](#) to safeguard against duplicative rebates for the same product and household. When an eligible entity (i.e., homeowner, tenant, building owner, or contractor) or eligible entity representative (as defined in the statute) applies to reserve a rebate for a product to be used at a specified address, the system will query a database to see if that type of rebate has already been issued for that address. If it has, the rebate request will be rejected, and the applicant will be informed that the applicable rebate has already been used at that address. The state's system will also notify all homeowners or building owners (and others if applicable (e.g., contractor)) that the rebate cannot be combined with other Federal grants and rebates, but the household may still be eligible for a Federal tax credit per Internal Revenue Service (IRS) guidelines.

10. Confirm that the State will provide information via API or DOE-provided spreadsheet to the DOE central database to ensure that rebates limited to a single or a combination of products are tracked and managed, and no duplicate rebates are awarded.

- State will provide information via API.
- State will provide information via a DOE-provided spreadsheet.

The State is expecting to provide information via API although, until the API reporting integration is complete the State may report via the DOE-provided spreadsheet.

11. Describe how the State will approach providing rebates to multifamily building owners and qualified households who live in multifamily units.

Multifamily building owners and tenants are eligible for rebates. However, owner authorization will be required for all projects.

Rebates are attributed to dwelling units or a multifamily building and the rebated equipment and appliances are to remain with the unit. Therefore, if a tenant vacates the unit where a rebated project was completed/equipment was installed, the tenant's new dwelling unit would be eligible for rebate funded projects/installations (assuming that rebates have not already been applied to that unit).

Rebates (and the maximum limits) apply to the dwelling unit and/or multifamily building. Therefore, owners will always be made aware of remaining rebate amounts even if a tenant initiates a rebate request. Owners will also have the ability to cancel the rebate reservation in the case they do not authorize the work. When determining the appropriate rebate amount for a multifamily building, the state will first determine whether the multifamily building qualifies as a low-income building (i.e., the building has at least 50% of households with incomes less than 80% AMI).

12. Identify the date after which upgrade projects must be completed for the purposes of being eligible for a rebate under the State program.

A rebate may be paid only for a qualified electrification project (QEP) initiated after the State receives authorization from DOE for rebate program launch and launches the program. Rebates will not be provided retroactively.

The entity applying for reimbursement of the rebate deducted at point of sale must submit required information within 60 DAYS of the issuance of the rebate coupon.

Vendors that use the DOE API will submit the used coupon and required information automatically either when the purchase is made or in batches (daily or weekly).

When a contractor applies the rebate coupon by deducting it from the invoice for installation, the contractor will need to submit the required information. This will take longer and therefore the state allows a longer period of time. The expiration date for the coupon will be on the coupon.

13. Describe how eligible rebate recipients will be informed of additional program funding available from non-Federal funds and grants.

- ☒ Defer response to State Implementation Blueprint (Marketing and Education Strategy).

Section 4.1.3 Low-Income Households

Note: Low-income households are defined as households with less than 80% Area Median Income (AMI). The U.S. Department of Housing and Urban Development (HUD) calculates median family income levels for areas across the U.S. HUD has a [website](#) where users can view these calculations. HUD also provides information on its [methods for calculating AMI statistics](#). HUD typically updates these values in March or April of each year. (see the [Program Requirements & Application Instructions](#) document Section 2.1)

14. Identify the portion of the rebate funds the State will reserve for low-income and low-income multi-family households.

[PENDING COMMISSION DECISION] The state plans to allocate a minimum of **[39.3%]** of rebate funds to low-income households. This is **consistent with (or greater than)** the percentage of low-income households in our state, which is 39.3%.

The state plans to allocate a minimum of **[10%]** of rebate funds to low-income multifamily buildings.

15. Provide a brief description of the procedures and penalties the State will provide to ensure that renters are not subject to unjustified rent increases.

The Public Service Commission has established processes to refer items to different state agencies depending on the issue. For payment default issues, the Commission can refer items to the Wisconsin Department of Justice (DOJ) and in the past has worked with the Wisconsin Department of Revenue (DOR) when an individual or entity has defaulted on a loan and entered into a collection's agreement. For consumer protections issues, such as business misrepresentation or fraud, the Commission can refer these matters to the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP). Consumers can also file a complaint directly with DATCP. The Commission also has an internal complaint process under Wis. Admin. Code chs. PSC 113 and 134 for consumers to file complaints and request a formal review process.

For all tenant-occupied properties that receive higher rebate amounts available only to households with incomes less than 80% AMI, the state will require the building owner to sign a statement acknowledging the following:

- The owner agrees to rent the dwelling unit to a low-income tenant.
- The owner agrees not to evict a tenant to obtain higher rent tenants based upon the improvements.
- The owner agrees not to increase the rent of any tenant of the building as a result of the energy improvements with exception of increases to recover actual increases in property taxes and/or specified operating expenses and maintenance costs.
- The owner agrees that if the property is sold within 2 years of receipt of the rebates, the aforementioned conditions apply to the new owner and must be part of the purchase agreement.
- In the event the owner does not comply, the owner must refund the rebate.
- The owner will provide written notice to tenants explaining their rights and the building owner's obligations (e.g., add an addendum to the lease).
- The owner will be subject to penalties commensurate to their actions with a minimum penalty of \$TBD.

The state will provide contact information for tenants to notify the state of breaches to this agreement. The State will also include this information in the consumer education campaign, so tenants are aware of their rights under the applicable state law.

Education and Outreach Plan: Contractor participation and understanding of the Home Efficiency Rebates program is critical for success. During the first 12-18 months after program launch there will be a heavy focus on contractor education and outreach. It will be important to be clear on what contractor expectations are if they are to deliver programs to participants. Outreach will begin with the existing Focus on Energy Trade Ally network. Contractors will have to agree to the IRA Code of Conduct, and provide any additional documentation the program requires for participation. Approval is estimated to take approximately two business days. Once participation is confirmed, the bulk of communication and interactions with contractors will be related to how to work through the steps of the program, making these steps easy for them to understand, and how to talk about the program to participants. Contractors can always reach program staff through a dedicated IRA email address, Focus on Energy phone number, or sign up through our online application (currently part of the Trade Ally website).

16. Describe how the State program will define a disadvantaged community. If not using the default disadvantaged community definition of low-income households located in a disadvantaged community identified by the [Climate and Economic Justice Screening Tool \(CEJST\)](#), a State must explain how the proposed definition will meet the following three criteria as described in DOE J40 implementation guidance:

The communities of concern identified by the State tool or definition must conform to the definition of communities established in U.S. Office of Management and Budget (OMB) guidance:

- a group of individuals living in geographic proximity to one another that experiences common conditions.
- a geographically dispersed set of individuals (such as migrant workers or Native Americans) that experiences common conditions.

The State tool or definition must consider two or more of the following indicators when identifying communities that should be classified as disadvantaged for the purposes of directing Federal investments under Justice40:

- Low income, high and/or persistent poverty
- High unemployment and underemployment
- Racial and ethnic residential segregation, particularly where the segregation stems from discrimination by government entities
- Linguistic isolation
- High housing cost burden and substandard housing
- Distressed neighborhoods
- High transportation cost burden and/or low transportation access
- Disproportionate environmental stressor burden and high cumulative impacts
- Limited water and sanitation access and affordability
- Disproportionate impacts from climate change
- High energy cost burden and low energy access
- Jobs lost through the energy transition
- Access to healthcare

The communities of concern identified by the State tool or definition must be currently mapped in software or must be easily overlaid in geographic information systems (GIS) so that communities can be easily identified by stakeholders.

[PENDING COMMISSION DECISION] The state will use the DOE-provided definition of DACs and use the federally-issued Climate and Economic Justice Screening Tool (CEJST) to identify DACs.

17. Identify the tool(s) the State will provide for eligible entity representatives to identify households that qualify for the installer incentive available for work in disadvantaged communities.

[PENDING COMMISSION DECISION] The State will be using the [DOE Rebate Tracking System](#) and will use the federally-issued [Climate and Economic Justice Screening Tool \(CEJST\)](#) to identify DACs.

18. Confirm that the State's intake system for users to provide income information will compare household income to 80% and 150% AMI values associated with that household's county and household size to determine rebate levels prior to signing statements regarding their income.

The state plans to use the DOE provided API to compare an applicant's household income, occupancy number, and address to the appropriate AMI level (80% or 150% AMI) to determine income eligibility.

19. If the State does NOT intend to use a federally provided web-based tool to determine whether a home is in a disadvantaged community, confirm that the State will provide the ZIP codes or a preferred more granular geography (e.g., census tract) with all disadvantaged communities as defined by the State to the DOE system.

- Yes, the State confirms the above statement.
- N/A. The State will use a federally provided web-based tool to determine whether a home is in a disadvantaged community.

Section 4.1.4 Community Benefits Plan

20. Confirm that the State will develop and submit a Community Benefits Plan prior to program launch.

- Yes, the State confirms the above statement.

Section 4.1.5 Processing and Delivering Rebate Funds to Eligible Rebate Recipients

21. Describe what types of systems will be put into place to allow for effective processing of rebates, including ensuring the ability to apply rebates at point of sale and/or as part of an invoice. And confirm that the system will link to federally provided systems via API.

- Yes, the system will link to federally provided systems via API.
- Defer response to State Implementation Blueprint.

The state will use the [DOE Rebate Tracking System](#) to ensure effective issuance of rebates. The state's implementation contractor(s) will be charged with establishing an electronic rebate processing system and required to process reimbursements for used rebate coupons (applied at point of sale or installation) within 30 days of receipt of a rebate reimbursement request.

The coupons will allow qualifying consumers or eligible entity representatives to have the rebate amount deducted at point of purchase of equipment. The contractor will apply the rebate to the invoice provided to the household. The coupon will designate the type of qualifying product as well as the maximum rebate amount and percentage (whichever is lower) that can be applied to the purchase. Contractors will be able to submit reimbursement requests via electronic systems.

22. Describe how the State will ensure processing of rebates within 4 weeks of receipt (e.g., through a processing company, through program implementers, or other entities or methods). Include information on corrective actions that the State will implement in the event of lengthier processing times.

The state will use an implementation contractor(s) to carry out rebate processing. The state will require rebate processing to occur within no more than 4 weeks of receipt of required and acceptable information.

Our implementation contractor(s) will be required to submit a rebate processing process flow that demonstrates how they will ensure the rebate requirements are completed within the required timelines. The implementation contractor will be required to demonstrate staff training on the protocols and offer a helpline for technical support.

Our program guidelines and onboarding process will include information on the process and requirements associated with submitting and accessing rebates on

behalf of consumers. The state will establish clear benchmarks and performance metrics and monitor performance.

The state will require our implementation contractor(s) to report processing times monthly. Should the processing times exceed those stipulated above, the state will require the implementation contractor to provide an explanation as well as propose and implement new methods or systems to speed up processing within 30 days of notification. Our contract with the implementation contractor(s) will include the option for the state to impose financial penalties on the contractor if processing times are not remedied in an acceptable period. Should the state find that processing (for specific reasons) cannot be completed within 60 days, the state will contact our DOE project officer to determine an appropriate process moving forward.

23. Describe how the proposed processing system will be integrated with a system for processing rebates under Section 50121. Note if the State plans to use separate systems.

The state will apply the DOE/PNNL provided workflows and use the [DOE Rebate Tracking System](#) to provide a seamless and integrated approach to both types of rebates.

Section 4.1.6 Verify Income Eligibility

Note: Low-income households are defined as households with less than 80% Area Median Income (AMI). The U.S. Department of Housing and Urban Development (HUD) calculates median family income levels for areas across the U.S. HUD has a [website](#) where users can view these calculations. HUD also provides information on its [methods for calculating AMI statistics](#). HUD typically updates these values in March or April of each year. (see the [Program Requirements & Application Instructions](#) document Section 2.1)

24. Describe how the State will define household income for verification purposes.

For households that provide income information, the state will request a sum of the income of all adult occupants over the past 12 months. Information from prior tax year earnings will also be acceptable. As long as the income requirements of identified federal programs fall below 80% AMI and/or 150% AMI, applicants enrolled in a program that qualifies them as categorically eligible do not need to provide this income information.

The state will follow the same household eligibility definitions that Focus on Energy used in 2023, as follows:

Eligible Household Members

All individuals living in the household at the time of application submittal (related, unrelated, or living together in the dwelling) are household members. Persons living in a housing arrangement with their own room who share common spaces are considered part of the household. Applicants must include all eligible household members on the Income Eligibility Application.

- Children
 - Children living with parents 50% of the time (50% custody) are counted.
 - If the parent claims the child on taxes, they can claim them as household members.
 - Some situations have one parent claim children on taxes one year, and the other parent claim them the next (still typically 50/50 custody)
 - Children living in household only every other weekend are not counted.
- Medical Attendants:
 - Live-in attendants are considered eligible Household Members if:
 - Live in the household full time (24/7).
 - Do not have another residence.
- Roomers/Boarders/Renters
 - Considered eligible if they have no other address and shared common spaces.
- Anyone living in the household for more than 3 months with no other address.

Ineligible Household Members

- Roomers/Boarders/Renters
 - A Roomer is a person who rents a sleeping room from the building owner. A roomer does not have a separate site address from other occupants of the building. A roomer does not share in providing or being provided the necessities of life for other residents of the structure. A roomer is a person who has proof of a permanent address but occupies a single room within the rooming house. A roomer in a single-family structure must verify he or she is not part of the economic unit of the other tenants of the structure.

- A Roomer is considered an eligible household member if they are living in a housing arrangement with their own room and sharing common spaces (such as kitchens, living rooms, TV rooms, recreation rooms). Persons sharing common spaces are part of a household with other members and eligibility must be assessed for the whole group with regards to SMI household size.
- Temporary Residents/Household Members
 - Individuals who are not permanent residents of the household and will be living in the household for less than 30 days after application submission. Temporary Residents include individuals who lived in the household during a portion of the preceding three months but are not living in the household at the time of application submittal.
- Foreign Exchange Students
 - Students from another country attending school on an exchange Offering and living in the household.
- College Students
 - Unless they live in the household full-time and do not have another residence (i.e., dorm room or apartment).
 - Are not considered household members even if home for the summer.
- Foster Children
 - Children of the customer who have been placed under foster care, who are orphaned, neglected, or delinquent and are not living in the household. (Foster children that the customer has taken in are counted as part of the household).
- Medical Attendants
 - Attendants who do not live in the household, and do not share in providing or being provided the necessities of life.
 - Note: If attendants live in the home full-time, see eligible Household Members.
- Military on Active Duty
 - A household member who is currently on active duty and deployed or has been called into active duty and is to be out of the household for at least 60 days. The base income of this individual should not be included on the application, but any household support provided to maintain the household (i.e. housing allowances, allotments sent directly to the household for support) should be listed on the Income Eligibility Application and should be counted as household income.

Household Member Income

- Income should not be included for any individuals who are not considered eligible household member.
- Earned income of minors under the age of 18 (or full-time high school students over the age of 18) should not be included. However, non-earned income such as Social Security benefits must be counted. This includes regular Social Security Benefits, Social Security Death (Survivor) Benefits, Social Security Disability Income, and Supplemental Security Income (SSI).

25. For single-family households, describe what combination of methods will be used for claimants to be able to establish their household income for income qualifications.

States may select the following options:

[CHECK ALL THAT APPLY:]

- Documentation of household income (for example, 1040)
- Documentation of enrollment in a pre-qualifying program
- Self-attestation of income level
- Self-attestation of enrollment in a pre-qualifying program

*Households that are enrolled in a pre-qualifying program for the HEAR rebates will be asked to provide documentation of enrollment in that pre-qualifying program **only** if the state is unable to verify enrollment via the program's database.*

The state may consider a future program modification to include a pathway for instant verification approval for certain emergency replacement scenarios.

The state will recognize any of the following documentation for income to establish that a household is eligible: 1040 from prior year, W2 forms, and wage statements/payroll.

The state also plans to offer categorical eligibility for the following programs listed in Tables A-3 and A-4 in the Appendix provided by DOE:

- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Head Start

- Lifeline Support for Affordable Communications (Lifeline)
- Food Distribution Program on Indian Reservations (FDPIR)
- National School Lunch Program – Free (NSLP)
- Housing Improvement Program (HIP)
- Housing Opportunities for Persons with AIDS
- Supplemental Security Income (SSI)
- Weatherization Assistance Program (WAP) –
80% AMI is greater than 200% FPL for 1-5 person households in each of Wisconsin’s 72 counties. In households of 6+ members 80% AMI is less than 200% FPL. Therefore, the state will allow categorical eligibility for WAP only for households with 1-5 members.

- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) –
Per the State of Wisconsin’s published WIC Income Eligibility Table, 80% AMI is greater than 185% FPL for all household sizes in every county in Wisconsin except the following counties: Ashland, Barron, Bayfield, Buffalo, Burnett, Clark, Crawford, Florence, Forest, Grant, Green Lake, Iron, Jackson, Juneau Lafayette, Langlade, Marinette, Marquette, Menominee, Oconto, Polk, Price, Richland, Rusk Sawyer, Shawano, Taylor, Vernon, Vilas, Washburn, Wood, Manitowoc, Oneida, Monroe, Pepin, Dodge Lincoln, Rock, Trempealeau, Waupaca, Dunn, Sauk, Door. Households that are not categorically eligible may still apply for higher rebates amounts through the income verification method.

1-8 member households that are under 80% AMI and are categorical eligibility are:

Fond du Lac County, Sheboygan County, Winnebago County, Douglas County, Chippewa County, Eau Claire County, Racine County, Portage County, Marathon County, Walworth County, Jefferson County, La Crosse County, Green County, Kenosha County, Brown County, Kewaunee County, Iowa County, Columbia County, Milwaukee County, Ozaukee County, Washington County, Waukesha County, Calumet County, Outagamie County, Dane County, Pierce County, Saint Croix County.

- Verified government or non-profit program serving Asset Limited Income Constrained Employed (ALICE) persons or households
- Public Housing (housing owned and operated by Public Housing Authorities)

26. For multifamily buildings, describe what combination of methods will be used to verify that at least 50% of dwelling units consist of households with incomes less than 80% AMI.

To qualify for low-income rebate amounts, multifamily building owners will be required to demonstrate that at least 50% of occupied dwelling units consist of households with incomes less than 80% AMI through either of the following methods:

[OPTION 1:] Provide documentation (as described in our single-family response to question #25) demonstrating that at least 50% of households either have incomes below 80% AMI or are enrolled in any of the approved programs listed.

OR

[OPTION 2:] Provide documentation that demonstrates that one of the following categories applies to 50% of the units in the multifamily building:

- Public Housing (housing owned and operated by Public Housing Authorities)
- Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)
- Privately-owned multifamily buildings that house residents receiving tenant-based assistance
- Section 42 Low Income Housing Tax Credit (LIHTC)

Subject to DOE approval, for the purposes of multifamily buildings, the state also proposes to recognize the following additional rental subsidy programs with equivalent income requirements.

- State Housing Tax Credit (HTC) available through the Wisconsin Housing and Economic Development Authority (WHEDA) – a dollar-for-dollar reduction of federal income taxes owed by owners/investors in qualified projects for tenants whose incomes are at or below 60% of County Median Income (CMI).

- a. For multifamily buildings, describe what combination of methods will be used to verify that at least 50% of dwelling units consist of households with incomes less than 150% AMI (but not less than 80% AMI).

Multifamily building owners will be required demonstrate that at least 50% of dwelling units consists of households with incomes less than 150% AMI through either of the following methods:

Provide documentation (as described in our single-family response to question #25) demonstrating that at least 50% of households either have incomes below 150% AMI or are enrolled in any of the approved programs listed.

27. Please confirm the following:

- a. Claimant will be required to note the number of individuals who occupy the dwelling unit.
- b. Claimant will be required to sign an affidavit attesting to the validity of all information provided (e.g., enrollment documents, household income, number of full-time occupants) irrespective of the method of income qualification (e.g., categorical eligibility, self-attestation).
- c. State's intake system for users to provide income information will display the 80% AMI value for that household's ZIP code and household size to assist the household in comparing its income with those levels prior to signing statements regarding their income.

Yes, the state confirms the above statements.

28. Describe how the 80% AMI and 150% AMI levels for each location will be kept up-to-date and linked to DOE systems. Provide additional information if proposing NOT to use a federally provided link or API

Defer response to State Implementation Blueprint.

Confirm that these levels will correspond to:

- The address of the dwelling unit at which rebates will be applied.
- The applicable number of household occupants.

Yes, the State confirms the above statements.

The state plans to use the DOE provided API to compare an applicant's household income, occupancy number, and address to the appropriate 80% or 150% AMI level to determine income eligibility and level of rebate.

29. Confirm that the State will do the following:

- a. Review information provided to support income eligibility for all applicants applying for higher income-based rebate levels.

Yes, the state confirms the above statement.

- b. Take steps to verify income eligibility for at least 50% of those applications that use self-attestation to support income eligibility (e.g., confirm enrollment in at least one program that the applicant asserted enrollment in; confirm household income via Income Verification Express Service or other methods as applicable).

Yes, the state confirms the above statement.

- c. After 6 months and not longer than 1 year after program launch, report to DOE the percentage and number of applicants that received rebates but were subsequently found to not meet eligibility requirements.

Yes, the state confirms the above statement.

- d. Work with the state's DOE project officer to institute additional safeguards or determine if a lesser level of review for applicants using self-attestation is justified depending on the percentage/number of rebates issued without meeting eligibility requirements.

Yes, the state confirms the above statement.

- e. If applicable, propose the types of information that the state will provide to DOE to warrant reducing this requirement (e.g., allowing implementers to verify income of a subset of claimants through random sampling).

N/A. The state will not reduce this requirement.

Defer response to State Implementation Blueprint.

30. Provide additional information as needed to demonstrate that the proposed approaches for income verification will address all types of households; not create undue burden for claimants; and include safeguards to minimize error and abuse in the process of verifying income.

By offering a variety of methods to demonstrate eligibility, including a wide range of programs recognized as providing categorical eligibility, the state believes that

those in the lowest income brackets will have a range of options to demonstrate their eligibility.

As a safeguard to discourage applicants from falsifying income information, all applicants, when submitting income verification information, will be required to sign an affidavit as well as confirm that they understand the following:

If the information provided is invalid and warrants you ineligible for this rebate, the rebate reservation, if not processed, will be canceled. If the rebate has already been applied to a purchase or service, the homeowner or building owner will be responsible for repaying the state for the rebated amount in addition to a fine not to exceed [TBD]. The state reserves the right to engage a bill collection agency should repayment not be made within a stated period.

To further minimize error in this process, the state will conduct a review of each applicant's income information prior to issuing a rebate coupon and giving the go-ahead to begin work. Furthermore, the state will encourage applicants to provide income information as soon as possible so that review can be concurrent with other steps such as the contractor creating a scope of work. Applicants will be notified of their status (whether they qualify as below 80% AMI) within a maximum of [3] business days of submitting their information.

31. Describe how the state will verify (confirm legitimacy) income information for all claimants (e.g., verification within X days through IRS, cross-check with enrollment databases of approved programs, calls to employers). If applicable, propose the types of information that the state will provide to DOE to warrant reducing this requirement (e.g., allowing implementers to verify income of a subset of claimants through random sampling).

Defer response to State Implementation Blueprint.

The state will use a combination of implementation contractors to collect income data and verify it through submitted income documentation, enrollment databases of approved programs, calls to employers, and/or other DOE-approved means of income verification. This information will be submitted through an online portal and reviewed by implementation staff. If a customer is unable to access the portal, or otherwise needs assistance, they can call into the Focus on Energy contact center.

The implementation contractor will review all documentation and track any errors. Based on the overall rate of false eligibility claims of [5%] or less, the state will work with DOE to determine whether the state can move to reducing the review process (that is, reviewing a lower percent of applications with documentation).

IF APPLICABLE: The state is also exploring agreements with several agencies to allow automated sharing of enrollment lists in qualifying programs. The state will work to incorporate this capability via API into the rebate application process.

32. Describe how the state will resolve instances when rebates are provided to those who have falsified their incomes.

As soon as the information is determined to be incorrect (with review time projected as [3] days), the implementation contractor's system will automatically do the following:

- (1) Cancel the coupon reservation.
- (2) Inform the homeowner or building owner (and contractor/eligible entity representative where applicable) via one of any contact information provided (emails, home address) that the coupon has been canceled and can no longer be applied.
- (3) Inform the homeowner or building owner that (a) their income eligibility information has been found to be insufficient or invalid, and they are no longer eligible for the requested rebate; or (b) in cases where additional information may establish their eligibility, they can reapply for consideration but will only be issued a new rebate coupon after that information is confirmed or (c) should the homeowner or building owner believe that the state's review is incorrect, they can petition a re-review within 30 days via a provided address, email, or call-in number.
- (4) If applicable, inform the homeowner or building owner (and contractor/eligible entity representative where applicable) that the household is eligible for the lesser rebate percentage cap (50%) and a new coupon can be requested.
- (5) Inform the homeowner or building owner that IF the rebate has already been applied at point of sale (by retailer, vendor, contractor/eligible entity representative), the homeowner or building owner must reimburse the state (via a provided address or through a provided call-in number via credit card) within 30 days for any rebate amount incorrectly applied with any additional requirement information. If the homeowner or building owner does NOT provide this reimbursement to the state within the allowable period, the state will file the claim to a collection agency and the homeowner or building owner will be subject to additional penalties per that process.

(6) Inform the contractor/eligible entity representative that if they have already performed the work and applied the rebate to the invoice, it is the homeowner or building owner's responsibility to pay back the state for the applied rebate.

(7) In any instances where a rebate is provided to a homeowner or building owner that is found to not meet income eligibility requirements, the state will bill the homeowner or building owner for the rebated amount. The state may impose an additional fine and will enlist a bill collection agency if repayment is not received within [ENTER NUMBER: X] days.

33. If proposing to allow self-attestation as a means for initial income qualification, provide a detailed description of how and when this approach will be used. Include statements, language, and detailed information regarding follow-up steps that will be used for this process. Additional topics to address include:

- a. Describe how those applying for rebates will be warned of potential liability associated with falsifying information.
- b. Explain how signed statements of self-attestation will be securely stored.
- c. Identify what level of falsified attestations will signal that the system needs to shut down either permanently or be restarted only after sufficient improvements are made.

Defer response to State Implementation Blueprint.

[PENDING COMMISSION DECISION]

The state does not intend to allow self-attestation at initial launch of the program.

34. Describe how the state program will verify applicant information provided to substantiate income eligibility, including systems that will be used to verify, where applicable, that at least one member of a household has been enrolled in a program included within the Federal Programs Approved for Categorical Eligibility document or other state-proposed approved by DOE within the prior 12 months.

The implementation contractor will oversee the income eligibility process and will be required to review all of an applicant's documentation whether to substantiate income or verify enrollment in a qualifying program. The implementation contractor will be required to visually review all submitted information.

In addition to visual review of documentation, the state plans to integrate automation into the process where possible (e.g., use of screening technology to review standard information like 1040 forms, enrollment cards for specific

programs) to confirm whether the information provided in the documentation meets requirements. Where needed, the implementation contractor will contact agencies that administer programs approved for categorical eligibility to confirm a household member's enrollment.

35. If applicable, identify the federal or other programs by which the state plans to allow categorical eligibility.

N/A. The state will not propose additional federal or other programs to be considered for categorical eligibility.

36. If applicable, propose any additional federal or other programs to be considered for categorical eligibility. For any programs not already approved, describe how the program's eligibility aligns with the Home Efficiency Rebates income requirements.

N/A. The state will not propose additional federal or other programs to be considered for categorical eligibility.

Defer response to State Implementation Blueprint.

37. Identify whether the state requests authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period (e.g., proof of enrollment within the past 12 months).

Yes, the state requests authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period.

N/A. The state does not request authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period.

If yes, explain the state's proposal and describe the rationale.

Defer response to State Implementation Blueprint.

[PENDING COMMISSION DECISION] To reduce potential confusion and align with the HOMES income verification process, the State proposes to allow eligibility to be determined using documentation dated within the preceding 24 months of the project being completed. The State recognizes that some low-income programs do not update their enrollment information annually; and some households (given relocations or other factors) may not have up-to-date

enrollment documentation. Therefore, the state proposes to accept documentation that demonstrates a household's enrollment within this longer period of time.

38. Identify whether the state requests authorization to allow categorical eligibility for a program in a way that is not consistent with the "level of categorical eligibility" listed in the document Federal Programs Approved for Categorical Eligibility. For each deviation requested, propose, and provide documentation to justify the requested change. Documentation must demonstrate that the state imposes income requirements equivalent to or less than 80% AMI.

Defer response to State Implementation Blueprint.

N/A. The state will not allow categorical eligibility for a program in a way that is not consistent with the "level of categorical eligibility" listed in the document Federal Programs Approved for Categorical Eligibility.

Section 4.1.7 Data Collection and Evaluation

39. Explain how data will be protected, specifically addressing security measures and privacy measures.

Defer response to State Implementation Blueprint.

The State of Wisconsin will set minimum standards to ensure the safety and privacy of the consumer data and documents collected to administer and implement the IRA Home Energy Rebate programs. The State will also establish cyber security provisions to be included in contracts for all partnering entities that will have access to and/or provide the HEAR data systems. Data collected by the State of Wisconsin in administering the programs may not be sold. Data collected by Wisconsin in administering the programs may be shared with Program Implementers and/or Evaluators with whom the State has a contractual relationship, and prohibitions against data selling and data sharing will be included in the contracts with those entities. For all other entities, collected data may not be shared with others except with the explicit written permission of DOE.

All Privacy and Security Risk assessments for the HEAR program will be developed using the State of Wisconsin's minimum baseline controls for Privacy and Security Risk Assessments. The State of Wisconsin will adhere to all policies and standards set by the Wisconsin Division of Enterprise Technology for information systems and environments used in the delivery of the HEAR program.

Each program partner will implement and maintain an Information Security Program, designating one or more employees to maintain it. The Information Security Program shall include, but not be limited to encryption, redaction, secure user authentication protocols, up to date firewall protection, physical safeguards, training, prohibition on saving Confidential Information on thumb drives, and any other necessary controls.

40. Include documentation of the processes to monitor, identify, and address security and privacy threats.

Defer response to State Implementation Blueprint.

The State of Wisconsin will conduct a review of the HEAR program's processes to monitor, identify, and address security and privacy threats prior to launching the program and every three (3) years thereafter, or more frequently if warranted. All individuals accessing the system(s) and program data will complete required trainings and have access to documentation that describe their responsibilities and expected behavior for information and system usage, security and privacy. A signed acknowledgement must be received prior to authorizing access to confidential information and the system(s).

The State of Wisconsin is expecting to use SPECTRUM, a CRM-based data management system, as the reporting and rebate payment system for HEAR. SPECTRUM is a custom-built Microsoft Dynamics 365 platform for Focus on Energy, Wisconsin's statewide energy efficiency and renewable energy program. In addition to the inherited security features of Microsoft, such as data encryption in transit and at rest, the State of Wisconsin has implemented additional security controls to protect against unauthorized access to the systems and program data. Risky sign-in alerts are received and reviewed by the IT Systems Manager overseeing the HEAR program. Alerts with a high-risk level require the user to reset their password and verify their identity through MFA and email. Notifications with low and medium risk require users to verify their identity through MFA.

Security control examples for users with access to SPECTRUM include:

- Unique logins.
- Multi-factor authentication.
- Defined and limited data access by role and specific use-case.

Program partners will report any suspected cyber security or privacy incident to the IT Systems Manager with the State overseeing the HEAR program within 24

hours of becoming aware of the occurrence. The State of Wisconsin will investigate the reasons for, and circumstances surrounding the Incident and take necessary actions to prevent, contain, and mitigate the impact of the Incident. Evidence concerning the Incident will be collected and preserved, including documentation regarding incident response and remedial actions taken. The State of Wisconsin will be responsible for reporting and communicating any confirmed data breaches to the public.

41. Confirm that the state will submit a Privacy and Security Risk Assessment in the State Implementation Blueprint.

- Yes, the state confirms the above statement and will include it with this narrative document.
- Yes, the state confirms the above statement but defers a response to State Implementation Blueprint.

The completed Privacy and Security Risk Assessment will be submitted at least two weeks prior to program launch.

42. Confirm that the state will collect the required data and cooperate in program evaluation processes as listed in Section 4.1.7.2 of the [Program Requirements & Application Instructions](#) document.

- Yes, the state confirms the above statement.

43. Confirm that the State will gain access to billing data when requested by DOE for program requirements and program evaluation.

- Yes, the state confirms the above statement.

[PENDING COMMISSION DECISION] The state will partner and work with utilities in the state to ensure DOE will have access to billing/usage data when requested. The utilities may elect to sign an agreement confirming their participation and additional details regarding data access coordination. These agreements will be submitted to DOE.

For all projects that apply for a 50122 Home Electrification & Appliance Rebate, the state will require the homeowner or building owner to provide access to 12 months of prior billing data. For categorically eligible customers, this data will be available to the State. For customers who are not categorically eligible, this can be done either by submitting that data to the contractor (who will then provide to the state). In either case, the homeowner or building owner must sign a statement that they provide access to 12 months of all energy utility billing data prior to the upgrade as well as 12 months of all energy utility billing data after the upgrade for evaluation purposes.

Please refer to the Utility Data Access Plan Implementation Blueprint for details regarding how the state will coordinate with utilities to gain access to billing data for program requirements and program evaluation.

44. Confirm whether the state is planning to conduct its own evaluation, and if so, what type(s) of evaluations.

- Yes, the state confirms the above statement. (Describe types of evaluations)

The state plans to conduct the following third-party led evaluations:

- Process evaluation to evaluate the program experience for program participants, consumers, contractors, distributors, vendors.
- Process evaluations to understand success and recommendations for improvements towards program priority areas (e.g., disadvantaged communities, multifamily, regionally focused programs)
- Impact evaluation to measure program impacts (e.g., consumer bills, fuel types, energy savings)

If the State plans to conduct evaluations on its programs, confirm that the state will:

- a. Cooperate with DOE to meet all the requirements listed in Section 4.1.7.2 of the Program Requirements & Application Instructions document.

- Yes, the state confirms the above statement.

b. Submit an evaluation plan for DOE review within three months of program launch.

Yes, the state confirms the above statement.

c. Provide results to DOE.

Yes, the state confirms the above statement.

45. If the state plans to conduct evaluations on its programs, describe the evaluation objectives, high level work plan, and timing of the evaluations and whether the state would request to be excluded from DOE-led evaluations.

Yes, the State agrees to meet the evaluation requirements.

N/A. The state does not plan to conduct its own evaluation.

- The state will establish our evaluation objectives as part of developing our evaluation plan. Potential objectives include but are not limited to (a) understanding program experience of different stakeholders to improve process (b) quantifying impacts on bill savings, GHG, and/or non-energy benefits and developing recommendations for increasing beneficial outcomes; (c) measuring lasting changes in behavior and decision-making of consumers and suppliers.
- As a first step, the state will identify what types of impacts/outcomes the state wants to measure.
- Evaluations will be designed to help us assess progress toward meeting our program's goals and to help us make process and other improvements over the course of the rebate program.
- Evaluations will be designed to complement national reviews as well as other components of our program design and implementation (e.g., quality assurance).
- The state will identify what data needs to be collected as part of our implementation processes (e.g., data on improvements, costs) and what data will be collected as part of evaluations (e.g., focus group responses). The state will ensure that relevant data collection is integrated into our implementation processes.

The state will develop a work plan that describes anticipated research strategies,

evaluation methods, as well as the size and timing of our evaluations. This work plan will be delivered to the DOE for approval within three months of program launch.

CONSUMER EXPERIENCE

Section 4.2.1: Education and Outreach Strategy

46. Confirm that the State will develop and submit an outreach and education strategy consistent with section 4.2.1.

- Yes, the State confirms the above statement.
- Defer response to State Implementation Blueprint.

The foundation for a positive consumer experience lies in effective outreach and education regarding the benefits of the IRA Home Energy Rebate programs. Focus on Energy (Focus) was chosen to administer the Wisconsin program because of the structure already in place to reach most of Wisconsin's residential customers. Focus on Energy has a successful communication platform already in place, i.e. website, newsletters, support channels, etc. Focus is also able to start with an engaged group of contractors, partners, and potential participants and will be able to share information on rebates that can be stacked on top of the Home Energy Rebates for participants. This may include additional rebates or services through the Department of Administration's Division of Energy, Housing and Community Resources (DEHCR) Home Energy Plus program, Focus on Energy, tax credits and other utility incentive programs.

Focus on Energy will utilize outreach efforts to cross promote both the Home Efficiency Rebates (HOMES) and Home Electrification and Appliance Rebates (HEAR) programs as much as possible and where appropriate, depending on the communication tactic and message.

Section 4.2.2 Qualified Electrification Projects

47. Describe how the State will verify that rebates are provided only for qualified electrification projects, including that each of the following conditions are met for each project:

- Project includes the purchase and installation of a qualifying product, as described in section 4.2.2 of the [Program Requirements & Application Instructions](#)

- The qualifying product is installed as part of new construction; or to replace a non- electric appliance; or as a first-time purchase with respect to that appliance
- The installation occurs at a single-family home or eligible multifamily building

The state will use the [DOE Rebate Tracking System](#) which will only generate coupons for qualified product types. Contractors that accept rebate coupons will be informed that the rebate only applies to qualifying products and that they will not be reimbursed should the installed or purchased equipment not be a qualifying product.

Any entity that applies the rebate at point of sale or installation is required to submit a proof of sale/invoice with detailed product information (model numbers, etc.). For contractors that install equipment, they are also required to take and submit geo- coded pictures of installed equipment, including nameplate information.

The state will inform customers that by accepting the rebate, they agree to participating in randomly selected reviews that would require them to provide geo-coded photos (when not already provided by an installer) or by allowing an inspector to come to their home to verify that qualifying equipment has been installed at the given address.

48. Describe how the State will collect and retain documentation to demonstrate how each criterion in section 4.2.2 of the [Program Requirements & Application Instructions](#) was met for each installation.

Defer response to State Implementation Blueprint.

The state will use the [DOE Rebate Tracking System](#) to collect and report required information. This system will allow easy retention as well as analysis of all rebates processed. Given that those applying to be reimbursed for rebates taken off at the point of sale or installation (e.g., retailers, vendors, contractors) must provide documentation prior to being reimbursed, the state will have information on each of these projects. In instances where all of the rebate is applied at the point of purchasing equipment, the state will randomly select a portion of these rebate projects for quality assurance to ensure that the purchased equipment is installed at the appropriate address. The state plans to

randomly select and conduct quality assurance on 25% of all claims submitted for the first year. Through this quality assurance process done remotely or in person, the state will verify what equipment was installed, where it was installed, and also request documentation of any equipment that was replaced. If more than 50% of the randomly selected claims prove to be accurate, then the state may choose to decrease the percentage of randomly selected claims downward over time.

49. If applicable, identify any additional types of “materials to improve ventilation” that the State plans to make eligible for rebates.

Defer response to State Implementation Blueprint.

N/A. The State will not include any additional types of “materials to improve ventilation” in the rebates.

Section 4.2.3: Installation Incentives

50. Describe how eligible entity representatives (EERs) will be determined to be eligible for installation incentives, and how and when incentives will be paid.

The state will be using the [DOE Rebate Tracking System](#) to issue and track rebate coupons. Based on the product type, the coupon will note the relevant incentive available to the contractor/EER per the table included in response to Question #8.

At that same time that the program issues the rebate coupon to be applied to the electrification and appliance rebates project, the program will reserve all incentive amounts for the EERs related to that project. Incentives will be paid to the contractor/EER when they submit the required information about the completed project. The state will conduct outreach to contractors/EER so that they are aware of this potential incentive.

51. Confirm that the State program will provide a clear incentive schedule commensurate with the scale of the upgrades installed not to exceed the maximum allowable values.

Yes, the State confirms the above statement.

52. Describe what tool(s) the State will provide for eligible entity representatives to identify households that qualify for an installer incentive for substantial installation located within a disadvantaged community.

Defer response to State Implementation Blueprint.

The state will be using the [DOE Rebate Tracking System](#) and will use the CEJST maps to identify DACs.

When a rebate coupon is issued via the DOE Rebate Tracking System, that unique coupon will state whether the home is located in a DAC. If it is located in a DAC and household income is below 80% AMI, the contractor/EER will be notified that they may be eligible for the **[PENDING COMMISSION DECISION] \$200** incentive if they complete a substantial installation within that home (which does not include projects with only an electric stove or heat pump dryer). Installer incentives for one household, however, cannot exceed \$500, per household.

As with the product incentives, the program will reserve up to \$200 for any project to be completed in a low-income (below 80% AMI) household in a DAC. The reserved amount will be limited by the \$500 cap on installer incentives per household. This incentive will be paid to the contractor/EER when they submit the required information about the completed project.

The state will conduct outreach to contractors/EER so they are aware of this potential incentive for substantial installations in DACs.

53. Confirm that the State program will automatically provide the incentive to eligible entity representatives in an amount not to exceed \$500 per dwelling unit or multifamily building in a 12-month period.

Yes, the State confirms the above statement.

Section 4.2.4 Home Assessments

54. Determine and describe a pre-defined set of home pre-condition(s) and/or scope of work scenario(s) that will constitute unacceptable risk of raising utility bills.

Defer response to State Implementation Blueprint.

The state will use the following criteria to determine utility bill risk:

- The home age, climate, level of insulation, and level of air/sealing/duct sealing.
- Fuel type and if the home is switching from natural gas to electric
- The fuel cost of the existing fuel and the fuel cost of the fuel used after replacement.

- An estimated bill impact calculation based on 1) fuel prices determined from above 2) average annual energy use of the home and 3) anticipated energy use after installation.

If this calculation provides a result that exceeds the existing utility energy bill, the project will be determined as too high risk and the application will be denied. The customer must be informed of the impact and provide acknowledgement of the denial.

The state will also work with experts (e.g., National Renewable Energy Laboratory (NREL) using ResStock, highly experienced contractors) to establish these guidelines and ensure that all contractors are aware that they must consider the guidelines before installing heat pumps (without other envelope improvements).

The state will inform contractors that they will be removed from the Registered Contractor list if there are two instances of them not following guidelines (based on data submitted from assessments or collected through quality assurance reviews).

The project implementer will review all proposed HVAC improvements where assessments are required prior to approving the rebate request (upon initiation).

55. Identify if the State will allow remote or virtual assessments in place of field-based assessments in cases of limited home assessments and if so, describe process.

- Yes, the State will allow remote or virtual assessments (describe below).
- No, the State will not allow remote or virtual assessments.
- Defer response to State Implementation Blueprint.

The state will allow virtual assessments prior to installation of any 50122 projects. Virtual and/or remote assessments will be required to include the same data and information as required for on-site assessments and submit all required information to the state or its implementer including but not limited to address, dwelling type, existing systems to be replaced, new systems proposed for installation, estimated total project cost, estimated household energy costs post-installation, certification that the household's existing systems qualify for application of the rebate, as well as any other data points required by the Data & Tools Requirements Guide.

Prior to launching the program, the state will develop and disseminate the minimum requirements for all home assessments for 50122 Home Electrification & Appliance Rebates as well as any additional guidelines for how to conduct a virtual assessment. The state will review assessment protocols used by Focus on Energy and other efficiency programs to inform the final requirements for both on-site and virtual assessments. The state may confer with experts (e.g., national labs, implementers, efficiency organizations) to develop effective protocols for virtual assessments. The state will publish the assessment requirements and provide these to all contractors on the qualified contractor list.

56. Describe what processes will be put in place for home energy assessments for multifamily buildings, including for energy used by common areas.

Defer response to State Implementation Blueprint.

As with single family buildings, prior to launching the program, the state will develop minimum requirements for all multifamily assessments for 50122 Home Electrification & Appliance Rebates. The state will also review assessment protocols used by Focus on Energy and other efficiency programs to inform the final requirements. The state will publish the multifamily building assessment requirements on the Focus on Energy website and provide these to all contractors on the Registered Contractor list by email.

Section 4.2.5: Consumer Protection Through Quality Assurance

57. Confirm that the State will prepare and implement a Consumer Protection Plan in accordance with these requirements in section 4.2.5 of the [Program Requirements & Application Instructions](#).

Yes, the state confirms the above statement.

REQUIREMENTS TO MAXIMIZE REBATE IMPACT

Section 4.3.1: Supporting the Clean Energy Economy Through Market Transformation

58. Certify that the state will prepare and implement a Market Transformation Plan within the first year after receiving the financial assistance award.

Yes, the state confirms the above statement and will provide the plan within the first year after receiving the financial assistance award.

Section 4.3.2: Integrating with Other Programs

59. Identify whether the state plans to take proactive steps to encourage integration with other programs. If so, identify with which programs the state will actively seek to integrate. The state may include letters of support or other indicators of commitment from existing program partners. Applications should identify whether programs will be integrated in any or the following areas:

- Integration into existing program administration, website, materials.
 - Adoption of existing program standards, QA, workforce standards, or other practices.
 - Braiding or co-funding of upgrades within individual households.
 - Other integration elements, as applicable.
- N/A. The state does not plan to integrate the rebates into any existing programs.

The state plans to integrate the Home Electrification and Appliance Rebate Program with the following program(s):

- Utility Programs: Focus on Energy, Commitment-to-Community, other voluntary utility programs – As one method for delivering these rebates, the state plans to leverage our utility programs. These utility-funded programs already have qualified contractors delivering HEAR QEPs and are therefore well suited to deliver the efficiency rebates as well.
- Weatherization Assistance Program (WAP) – To the extent feasible given restrictions in combining federal grants and rebates, as one portion of our rebates, the state plans to leverage our state-funded weatherization programs to deliver additional whole-home energy efficiency services to low-income households in our state.
- Other state, municipal, and non-profit efforts – to the extent possible, the state will attempt to work with other agencies, local governments, and community-based organization with additional funding or grants available to further stack funding.

By deeply integrating the Home Electrification and Appliance Rebate Program with Focus on Energy, the state will build on existing consumer education materials, quality assurance activities, and workforce qualifications. For example, Focus on Energy has well established quality assurance efforts which can be carried out in concert with the QA needed for ensuring effective use of the Home Electrification Appliance Rebates Program. As another example, Focus on Energy has well established workforce standards that the state may adopt as

either a minimum standard or one acceptable method for becoming a qualified contractor for the rebate program.

Regardless of whether the state can fully integrate home energy rebates into our existing programs, the state will be sure that any program co-funding or braiding comply with all DOE requirements including the Program Requirements & Application Instructions document.

60. Describe how the state program will support households, contractors, aggregators, and other stakeholders in understanding how the state program may leverage other program resources.

Defer response to State Implementation Blueprint.

Focus on Energy has a successful communication platform already in place, i.e. website, newsletters, support channels, etc. Focus is also able to start with an engaged group of contractors, partners, and potential participants and will be able to share information on rebates that can be stacked on top of the Home Energy Rebates for participants. This may include additional rebates or services through the Department of Administration's Division of Energy, Housing and Community Resources (DEHCR) Home Energy Plus program, Focus on Energy, tax credits and other utility incentive programs.

Focus on Energy will utilize outreach efforts to cross promote both the Home Efficiency Rebates (HOMES) and Home Electrification and Appliance Rebates (HEAR) programs as much as possible and where appropriate, depending on the communication tactic and message.

61. Describe the method(s) the state will use to ensure the total combination of all immediate upfront funding sources (federal grants, federal loans, and non-federal funding) provided to a project does not exceed the total project cost.

Defer response to State Implementation Blueprint.

The state will educate contractors (and consumers) regarding the restriction of applying incentives that exceed total project cost. All contractors on the qualified contractor list will be given a pre-launch set of materials including information regarding the restrictions on braiding and the restriction that total upfront incentives cannot exceed the total project cost. Contractors will also be required

to take full advantage of any other funding opportunities (besides tax credits) before applying HEAR rebates.

When a homeowner or building owner initiates the process by requesting a rebate, they will be required to confirm that they understand the following:

A homeowner or building owner is not eligible for rebate funds that, in combination with other rebates or financial incentives, exceed the total project cost. A homeowner must inform their contractor of other incentives that they are receiving toward the cost of the project. The contractor will ensure that all incentives the customer discloses are accounted for before any remaining costs are covered by this Home Electrification and Appliance Rebate. The contractor will list all incentives disclosed by the customer, the Home Electrification and Appliance Rebate, and the amounts for each on their invoice to the customer. A copy of the invoice must be signed by the homeowner or building owner.

The contractor will also require the homeowner or building owner to sign an affidavit stating that they did not receive funds in excess of the total project costs.

Finally, the state will require contractors to list all applied incentives on the invoice that must be sent to the state/implementer in order to receive reimbursement for all 50122 Home Electrification & Appliance Rebates applied at point of installation/service.

62. Describe how the state program will support contractors and retailers in preparing acceptable invoices that may be kept as program records.

Defer response to State Implementation Blueprint.

The state will provide a sample invoice showing all prescribed components of the invoice. The sample invoice will be provided to contractors prior to program launch and will also be made available on the Program's website.

Contractors will be assigned an Energy Advisor who will provide training on invoicing and application submittal. Energy Advisors will be available to provide additional training for contractors, as needed.

Implementers will be required to review all submitted information from delivered projects prior to reimbursing contractors. The state intends to use the DOE workflows which include quality assurance and review steps as well as

opportunities for contractors to submit any missing information should their documentation be initially rejected by the implementer.

In the event of an audit, the implementer or the state will be able to promptly provide all invoice documentation since it will be submitted electronically through the [DOE Rebate Tracking System](#) and submitted through a separate user interface for contractors that will upload the information manually. All of these records will be retained by the Program in its database of record, and the majority of this information will already be provided to DOE.

63. Describe how the state will ensure rebate recipients be made aware of the portion of the funding received from the DOE Home Electrification and Appliance Rebates.

- Defer response to State Implementation Blueprint.

The state will use the [DOE Rebate Tracking System](#) and workflows which include multiple notifications to all participants including homeowners and building owners regarding the level of DOE Home Electrification and Appliance Rebates available and applied.

In line with the response to question #61, contractors will be required to list all rebates and incentives received by the customer as separate line items on the customer invoice. This must be signed by the homeowner or building owner. Without this documentation, contractors will not be reimbursed.

Section 3.3.3: Quick Starts

64. Identify whether the application is for a Quick Start program. For Quick Start programs, identify the timeline for program launch.

- Yes, this is for a Quick Start Program.
- No, this is not for a Quick Start Program.

APPENDIX

Home Efficiency Rebates

Measured and Modeled Rebate Levels

Table A-1. Modeled Savings Rebate Levels

Single-Family		
Modeled Energy Savings	Income Level	Rebate Amount
20%-34%	Less than 80% AMI*	Lesser of \$4,000 or 80% of project cost
	80% AMI and greater	Lesser of \$2,000 or 50% of project cost
35% or greater	Less than 80% AMI*	Lesser of \$8,000 or 80% of project cost
	80% AMI and greater	Lesser of \$4,000 or 50% of project cost
Multifamily		
Modeled Energy Savings	Income Level	Rebate Amount
20%-34%	A building with at least 50% of households with incomes less than 80% AMI*	Lesser of \$4,000 per dwelling unit or 80% of project cost
	A building with at least 50% of households with incomes 80% AMI and greater	\$2,000 per dwelling unit up to \$200,000 per building
35% or greater	A building with at least 50% of households with incomes less than 80% AMI *	Lesser of \$8,000 per dwelling unit or 80% of project cost
	A building with at least 50% of households with incomes 80% AMI and greater	\$4,000 per dwelling unit up to \$400,000 per building

*States may increase the maximum amount available for low-income households upon approval from DOE.¹ See Section 3.1.3 for details.

¹ 42 U.S.C. 18795(c)(3).

Table A-2. Measured Savings Rebate Levels

Single-Family		
Measured Energy Savings	Income Level	Rebate Amount
15% or greater	Less than 80% AMI	kWh, or kWh equivalent, payment rate equal to \$4,000 for a 20% reduction of energy use for the average home in the state or 80% of project cost*
	80% AMI and greater	kWh, or kWh equivalent, payment rate equal to \$2,000 for a 20% reduction of energy use for the average home in the state or 50% of project cost
Multifamily		
Measured Energy Savings	Income Level	Rebate Amount
15% or greater	A building with at least 50% of households with incomes less than 80% AMI	kWh, or kWh equivalent, payment rate equal to \$4,000 for a 20% reduction of energy use per dwelling for the average multifamily building in the state or 80% of project cost**
	A building with at least 50% of households with incomes 80% AMI and greater	kWh, or kWh equivalent, payment rate equal to \$2,000 for a 20% reduction of energy use per dwelling for the average multifamily building in the state or 50% of project cost

*Per statute, the measured energy saving of the home or portfolio of homes must achieve 15% savings, but the calculation of the rebate is based on a 20% reduction of average home energy use of a home in the state.

**States may increase the maximum amount available for low-income households upon approval from DOE.² See Section 3.1.3 for details.

² 42 U.S.C. 18795(c)(3).

Federal Programs Approved for Categorical Eligibility

Table A-3. Recognized Programs for Categorical Eligibility of Home Efficiency Rebates

Recognized Program	Eligible for Higher Level of Home Efficiency Rebates
Low Income Home Energy Assistance Program (LIHEAP)	X
Medicaid	X
Supplemental Nutrition Assistance Program (SNAP)	X
Head Start	X
Lifeline Support for Affordable Communications (Lifeline)	X
Food Distribution Program on Indian Reservations (FDPIR)	X
National School Lunch Program – Free (NSLP)	X
Housing Improvement Program (HIP)	X
Housing Opportunities for Persons with AIDS	X
Supplemental Security Income (SSI)	X
Weatherization Assistance Program (WAP)	Automatically eligible ONLY if household is located in an area where 80% AMI (Area Median Income) is greater than 200% Federal Poverty Level (FPL)
WIC	Automatically eligible ONLY if household is located in an area where 80% AMI is greater than 185% FPL.
Other (programs approved by DOE through state application process)	States may propose other income-verified programs for categorical eligibility in their applications. DOE will approve if those income criteria meet the Home Energy Rebates income criteria set forth in the Inflation Reduction Act.

Table A-4. Recognized Housing Programs for Categorical Eligibility of Home Efficiency Rebates

Recognized Program	Level of Categorical Eligibility for Rebates for Renters Receiving Housing Assistance	Whole Building Eligibility for Rebates
Public Housing (housing owned and operated by Public Housing Authorities)	Below 80% AMI	Single- and multi-family buildings owned and operated by Public Housing Authorities are fully eligible.
Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)	Below 80% AMI	If at least 50% of housing units are subsidized through these programs, then the multifamily building is fully eligible.
Privately-owned multifamily buildings that house residents receiving tenant-based assistance	Below 80% AMI	If at least 50% of building occupants receive tenant-based assistance, then the multifamily building is fully eligible.
Low Income Housing Tax Credit (LIHTC)	Below 80% AMI	If at least 50% of housing units are income-restricted, then the multifamily building is fully eligible.

Attachment 7

Community Benefits Plan

State of Wisconsin Home Energy Rebates Home Electrification and Appliance Rebate (HEAR) Program

Contents

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Purpose and Introduction

The Inflation Reduction Act (IRA) Home Electrification and Appliance Rebate Program in Wisconsin, heretofore referred to as the HEAR program, aims to encourage the adoption of high-efficiency electric equipment measures in the state's existing housing stock and residential new construction to reduce residents' energy consumption, promote the health benefits of electrification, modernize household equipment, and to promote sustainable practices.

The purpose of this document is to summarize the specific objectives the State of Wisconsin is committing to in its Community Benefits Plan (CBP). This will include defining the intended community

benefits in quantifiable terms with SMART milestones – **S**pecific, **M**easurable, **A**chievable, **R**elevant, and **T**imely – and timelines wherever possible.

This CBP for the HEAR program, led by the State of Wisconsin and delivered by Focus on Energy, outlines the strategy and objectives for community and workforce engagement as well as diversity, equity, inclusion, and accessibility in alignment with the Justice40 Initiative. This CBP is also intended to document the benefits this program will provide to Wisconsin residents and workers that may have historically faced disproportionate barriers to accessing energy efficiency programs and equipment upgrades available in the state. The program is a next step in improving energy upgrades in homes across the state, with a focus on low-to-moderate income residents statewide, and residents living in Justice40 Disadvantaged Communities (DACs).

SMART Goals

Department of Energy (DOE) program guidance requires states to include at least one SMART milestone per calendar year to measure progress on proposed actions. The State of Wisconsin proposes the SMART milestones in the table below. The State of Wisconsin commits to making this Community Benefits Plan, the SMART milestones it establishes herein, and measured progress toward those milestones available to the public on the Focus on Energy website. Additional discussion of these SMART milestones is presented in subsequent sections of the CBP.

Year	Community and Labor Engagement	Investing in Job Quality and a Skilled Workforce	Diversity, Equity, Inclusion, and Accessibility	Justice40
2024	<ol style="list-style-type: none"> 1. Explore one or more agreements (e.g. MOU) between PSC and DEHCR to align HEAR program and WAP. 2. Leverage existing Focus on Energy Trade Ally contractor network to recruit workforce of IRA Home Energy Rebates Registered Contractors. 	<ol style="list-style-type: none"> 1. Inventory areas of the state that currently do not have Focus on Energy contractors available to serve adjacent DACs. 2. Participate in 50123 TREC Workforce Advisory group meetings. 	<ol style="list-style-type: none"> 1. Inventory areas of the state currently underserved by efficiency programs. Use this data to find overlapping communities in Justice40 DACs to target outreach and engagement to. 2. Partner with at least 10 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and 	<ol style="list-style-type: none"> 1. Set program goal at least 40% of rebate spend occurs in Justice40 DACs. 2. Partner with at least 10 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and refer eligible households to participate.

			refer eligible households to participate.	
2025	<p>1. Build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.</p>	<p>1. Leverage communication channels to reach past participants of HEAR program to notify them of potential job and training opportunities.</p> <p>2. Meet with Wisconsin Department of Workforce Development (DWD) on workforce needs resulting from IRA Home Energy Rebates.</p>	<p>1. Partner with at least 5 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and refer eligible households to participate.</p> <p>2. The State of Wisconsin commits to providing customers with information and tools to support a diverse choice of contractors from a variety of DEIA backgrounds, specified in more detail in this CBP.</p>	<p>1. Hold a Tribal Energy Symposium event on IRA Home Energy Rebate programs.</p> <p>2. Continue to engage with CBOs of 2024 efforts, at least biannually. Partner with an additional 5 CBOs located in DACs to expand partnerships and reach.</p> <p>3. Partner with Wisconsin Department of Health Asthma Prevention team to target electrification benefits to households with childhood asthma cases.</p>
2026	<p>1. State of Wisconsin will build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.</p>	<p>2. Identify DACs in the state that have had low participation in the IRA Home Energy Rebates due to contractor availability. Coordinate with the 50123 TREC effort to provide training in these areas of the state.</p>	<p>3. The State of Wisconsin has a goal of recruiting at least 10 new IRA Home Energy Rebates Registered Contractors with DEIA designations, defined later in this plan, by the end of the second year of the HEAR program.</p>	<p>1. Identify DACs in the state that have had low participation in the IRA Home Energy Rebates and partner with at least 5 CBOs located in this low-participation DACs to boost participation.</p> <p>2. Track status of low-income program participation in single-family and multifamily households as well as percentage of program spending on</p>

				<p>projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward [PENDING COMMISSION DECISION] % spend goal on low-income households and [PENDING COMMISSION DECISION] % of project funds awarded toward projects located in Justice40 DACs.</p>
2027	<p>State of Wisconsin will build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.</p>	<p>The State of Wisconsin commits to partnering with at least 2 technical colleges in the state to encourage them to include rebate-eligible technologies into their curriculum during the implementation period of the HEAR program, to foster a future clean energy workforce pipeline.</p>	<p>The state of Wisconsin has a goal of recruiting at least 5 new IRA Home Energy Rebates Registered Contractors with DEIA designations.</p>	<ol style="list-style-type: none"> 1. Continue to engage with CBOs of 2024-2026 efforts, at least bi-annually. Partner with an additional 3 CBOs located in DACs to expand partnerships and reach. 2. Track status of low-income program participation to date in single-family and multifamily households as well as percentage of program spending on projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward [PENDING COMMISSION DECISION] % spend goal on low-income households and

				[PENDING COMMISSION DECISION] % of project funds awarded toward projects located in Justice40 DACs.
2028	State of Wisconsin will build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.	As program funds are nearing depletion, meet with Wisconsin Department of Workforce Development (DWD) on workforce needs resulting from IRA Home Energy Rebates, including how industry has changed and anticipated shifts as funding runs out.	The state of Wisconsin has a goal of recruiting at least 3 new IRA Home Energy Rebates Registered Contractors with DEIA designations.	Track status of low-income program participation to date in single-family and multifamily households as well as percentage of program spending on projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward [PENDING COMMISSION DECISION] % spend goal on low-income households and [PENDING COMMISSION DECISION] % of project funds awarded toward projects located in Justice40 DACs. Consider additional partnerships with CBOs based on results and rebate distribution throughout state.
2029	State of Wisconsin will build or expand upon existing labor relationships with the labor organizations described in this	As program funds are nearing depletion, meet with Wisconsin Department of Workforce Development (DWD)	The state of Wisconsin has a goal of recruiting at least 3 new IRA Home Energy Rebates Registered	Identify at least 3 CBOs located in DACs to develop scope for a clean energy workforce career pipeline program with.

	report. Establish annual meeting cadence.	on workforce needs resulting from IRA Home Energy Rebates, including how industry has changed and anticipated shifts as funding runs out.	Contractors with DEIA designations.	
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Given that this is a new, federal program to be launched in Wisconsin, some goals are difficult to be defined as specific *and* achievable until after one year of implementation. In the table above, the State of Wisconsin has put forth our best attempt to capture how the state will encourage and ensure that the HEAR program benefits communities – especially those that are low-income and in Justice40 disadvantaged communities. As part of achieving these goals, as well as the minimum requirements put forth by the Department of Energy, Wisconsin commits to tracking and reporting of metrics such as:

- Number of projects completed in Justice40 DACs.
- Number of projects completed at customer sites where delivered fuel is the baseline, primary heating source.
- Number of projects completed in energy-burdened census tracts.
- Rebate spend on projects completed in Justice40 DACs.
- Rebate spend on projects completed with customers that have delivered fuel.
- Rebate spend on projects completed in energy-burdened census tracts.
- Estimated energy savings from projects completed in Justice40 DACs.
- Estimated energy savings from projects completed with customers that have delivered fuel.
- Estimated energy savings from projects completed in energy-burdened census tracts.
- Customer satisfaction with program.
- Customer self-reported energy bill impacts.

This tracking and reporting will be used to assess the program’s performance relative to the SMART goals outlined in the table above and may inform areas of program improvement to increase the likelihood that goals are achieved.

The remainder of this document will summarize the specific objectives the State of Wisconsin is committed to in the relevant section of this Community Benefits Plan, broken into specific commitments, engagements, tasks, and sub-tasks.

General Program Information

The HEAR program will provide rebates to Wisconsin residents performing qualified electrification projects. Depending on the projects performed participants will experience the benefits of improved efficiency and modernization of household equipment and appliances, improved indoor air quality and related health benefits, and reduced energy bills. Projects completed will also contribute towards reduction in greenhouse gas emissions. In alignment with the requirements of the Inflation Reduction Act and U.S. Department of Energy, Wisconsin will make this program available to residents of single family and multifamily buildings in the state living in households at or below 150% of AMI. Increased rebate levels will be made available to eligible low-income households (defined throughout this plan as those earning less than 80% AMI) to encourage adoption of energy saving electric measures for those

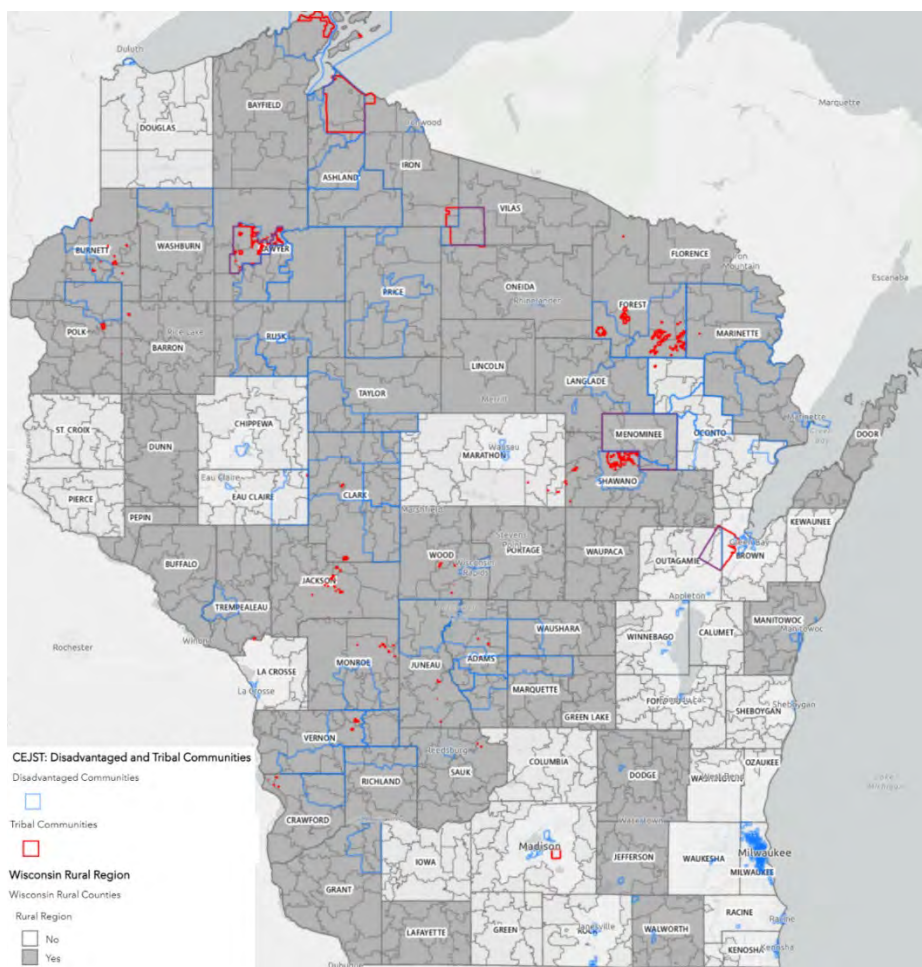
residents of the state who have traditionally been unable to afford the upfront cost of energy-efficient electric equipment. Additionally, the State of Wisconsin will offer incentives to Registered Contractors performing the installation of qualified electrification projects. **[PENDING COMMISSION DECISION]** Registered Contractors performing qualified electrification projects in Justice40 DACs will be eligible to receive higher incentives to encourage greater access to program rebates to residents of these communities.

The State of Wisconsin's Public Service Commission (PSC) has established additional guiding principles to ensure the benefits of Wisconsin's HEAR program are distributed to underserved and disadvantaged communities in the state. The PSC has outlined the following strategic objectives and core principles for the design and delivery of these funds to advance equity and improve the lives of energy burdened households:

1. The program should leverage existing Focus on Energy infrastructure to maximize administrative efficiency and improve customer experience while maintaining appropriate separation, per Commission order.
2. The program will target rebates to customers where up-front costs have been barriers to participating in Focus on Energy and particularly, in areas of the state with high energy burden and service territories that depend on delivered fuels.
3. The rebate experience should be simple and clear for all participants (customers, contractors, distributors and retailers). Customer eligibility requirements, product and project requirements, and other processes should be well documented and easily understood.
4. Electrification projects should result in reduced household energy bills.
5. Program planning and implementation will be transparent and offer opportunities for stakeholder input and public comment.
6. Program design should support long-term workforce development opportunities and leverage contractor training grant funding where possible.

With these guiding principles in mind, as well as other federal funding opportunities occurring in Wisconsin, the PSC has created a webmap to display Justice40 DACs alongside rural zip codes and tribal communities, which are target underserved communities in the state. This webmap can be accessed from the PSC website.¹ A screenshot of the webmap is shown below.

¹ Public Service Commission Office of Energy Innovation. OEI Map. Accessed from: <https://maps.psc.wi.gov/portal/apps/webappviewer/index.html?id=cd2b3dc76d4d460da05d72c254123318>



The next sections of this CBP will focus on how the State of Wisconsin will ensure the HEAR program rebate funds benefit Wisconsinites – particularly those of in disadvantaged, rural, and underserved communities, as well as supporting details on how Wisconsin will meet our SMART goals and timelines.

Engage Community and Labor

Wisconsin performed a robust effort to engage with residents, community partners, local and Tribal governments, and the state’s workforce and labor organizations to educate stakeholders on the programs and gather their input on key program design considerations. The program is committed to engaging with underserved communities, including DACs, in the program planning, design, implementation, and evaluation processes.

The Wisconsin HEAR program will be delivered through Focus on Energy (Focus), Wisconsin’s statewide energy efficiency and renewable resource program funded by utility customers. Delivery of the HEAR program will build upon the community and workforce relationships cultivated over more than two decades of delivering efficiency programming to Wisconsin residents and communities. The State of Wisconsin views the HEAR program as an opportunity to serve those that have historically been underserved or unable to participate in existing efficiency programs as well as those that could benefit most from energy savings (i.e., those with high energy burdens).

Focus is actively engaged with communities served by its programs to improve access and uptake of energy efficiency programs. This engagement includes direct outreach with local governments, Tribal governments, and community-based organizations serving DACs. Further detail of these efforts is described below.

Background: Community and Labor Stakeholders Engaged to Date

Community-Based Organizations

Over the last year, Focus has increased its outreach efforts with community-based organizations (CBOs) that work with marginalized communities to gather input on effective methods to improve program access for the populations they serve. The learnings of this ongoing effort can be applied to implementing the HEAR program rebates to ensure communities with the most need will have access to and experience the program's benefits. Focus recently interviewed staff and volunteers at 20 CBOs throughout Wisconsin to learn how energy intersects with their work, build relationships, gauge interest in future collaboration with Focus, and learn how they target their services to overcome barriers to helping those most in need.

The CBO partners selected for interviews serve communities:

- on low- or fixed-incomes;
- with significant populations of people of color, non-English or limited-English speaking populations;
- that are rural; or
- that are predominantly older adults (aged 65+), veterans, renters, or people living with disabilities.

The approach to selecting CBOs for interviews also considered their geographic service territory and the extent that territory overlaps with Justice40 DACs (based on the Department of Energy's CEJST screening tool). Many of these organizations specialize in emergency food provisions (food pantries), housing services, and other emergency and social services.

This engagement was performed during spring and summer of 2023. Through this effort, Focus staff gained familiarity with the programs available to assist homeowners and renters in improving energy efficiency in Wisconsin. Focus staff also came away from these interviews with specific information on barriers to participation, areas of interest for these customers, and connections for further outreach and engagement, including potential collaboration on new federal energy rebate programs (i.e., Home Energy Rebates).

Some of the main themes learned from interviews conducted by Focus, which the State of Wisconsin will consider during the design and implementation of the HEAR program, include:

- CBOs need a clear understanding of energy efficiency programs available (e.g. eligibility requirements, equipment or services covered, etc.).
- Underserved communities are less likely to be aware that energy-saving programs, like Focus, exist or how to take advantage of them.
- Renters have limited opportunities to participate in efficiency programs, despite often having higher energy burdens and societal disadvantages. Program administrators should consider how

to engage landlords on programming that benefits tenants, as well as how to communicate what programs are available for tenants to participate in directly.

- Older adults are a uniquely underserved demographic that live on a fixed income, are less likely to receive information when promoted digitally or when online participation is required, and are wary of scams.
- First costs of energy efficiency projects remain a barrier to participation, even when higher incentives are eligible to lower income participants.
- Cultural and linguistic barriers reduce accessibility to efficiency programs. Offering program materials and websites in additional languages and partnering with CBOs can address this barrier.

In response to these barriers, the State of Wisconsin and Focus staff will continue to engage with these organizations and additional organizations serving as trusted community resources as they are identified, throughout the planning and implementation phases of the HEAR program. The State of Wisconsin recognizes the time and expertise provided by these organizations as well as their ability to reach residents that can benefit the most from efficiency and home energy upgrades. Additional planning and discussion on what framework to use for potential CBO compensation is anticipated, which would include the overall budget, individual or group rates, and qualifying actions.

A list of some of the community-based organizations that Focus has engaged with to date are listed below.

Community-Based Organizations Engaged to Date:

- Wisconsin EcoLatinos
- Walnut Way / Lindsay Heights Neighborhood Improvement District
- Sheboygan County Housing Coalition
- Green Homeowners United
- Citizens Action Wisconsin (energy burden coordinator)
- Elevate Energy
- Wisconsin Citizens Utility Board
- Aging & Disability Resource Center (ADRC) of Dane & Brown Counties
- Urban League of Greater Madison
- Food pantries: WayForward (formerly Middleton Outreach Ministries), Stepping Stones, CORE Community Resources, and Project Bootstrap

Local Governments Engaged to Date

Over the last year, Focus has built new relationships and strengthened existing relationships with local governments across Wisconsin. Focus recently hired a Community Liaison Manager to fulfill this role. Since then, staff have met with over 50 local governments across Wisconsin to learn how the program can better support local energy goals and partner to ensure their residents and businesses are aware of energy efficiency resources and incentives available to help them save energy/money. Local governments have been engaged to date to understand their priorities for delivering the HEAR program benefits to their residents, as well as to identify locations and stakeholders to engage during the HEAR program planning process. The Focus Community Liaison Manager will serve on the HEAR program team supporting coordination and engagement with local governments.

Focus has also built relationships with the Wisconsin Local Government Climate Coalition and Wisconsin Department of Natural Resources (DNR) Green Tier Legacy Communities program. These groups

support communities that are actively involved in promoting the Focus program or creating their own energy efficiency programming for their localities. The communities engaged thus far have expressed interest in learning more about Inflation Reduction Act funds and are anticipated to be active partners in connecting residents to participate in and benefit from the HEAR program.

Through its outreach and engagement efforts over time, Focus has established relationships with the following partners representing local governments:

- **Wisconsin Local Government Climate Coalition (WLGCC)** WLGCC is a collective of cities and counties in Wisconsin that together represent 1 in 3 Wisconsin residents. The goal of the coalition is to advocate for strong climate action in the state. The group has been supportive of Focus and energy efficiency generally and is eager to help support engagement and participation in new federal funding opportunities, including the Home Energy Rebate programs in Wisconsin.
- **WI Department of Natural Resources Green Tier Legacy Communities (GLTC)** Hosted by the Wisconsin DNR, the GLTC are a group of local government leaders preparing for the future and building sustainable and resilient communities. The GLTC network advances sustainable, efficient practices to stretch local government resources. It includes mostly different cities from the WLGCC, including areas of the state that have high rates of delivered fuels.
- **Vernon County Energy District (VCED)** The VCED is a nonprofit located in Vernon County, WI with a goal of fostering local, sustainable energy to meet the needs of the county. They promote energy efficiency and renewable energy resources, and have expressed interest in these federal funds due to the high energy burdens and proportion of delivered fuels in their area.

Tribal Governments

The Focus program is available to all 12 Tribal governments in Wisconsin that are served by participating utilities. Wisconsin will leverage the Focus program's existing and growing relationships with Tribal governments to ensure that Tribal communities have access to participate in the HEAR program. For example, to increase participation in energy efficiency programs amongst tribal members and in homes on tribal land, Focus partners with Tribal governments to offer a special program to train tribal community members on Building Performance Institute certification to enable more homes on tribal land to qualify for higher insulation and air sealing rebates. This program not only builds energy efficiency workforce skills, but also improves the payback of insulation and air sealing through higher rebates. Focus is also partnering with two local energy efficiency nonprofits, Slipstream and Elevate, to improve the efficiency of multifamily homes on tribal land, including the weatherization and installation of air source heat pumps to reduce propane usage and provide efficient air conditioning to these spaces.

The PSC and Focus on Energy staff held the first Tribal Energy Symposium in spring of 2023. Six Tribal Nations attended along with representatives from utilities, DNR and Slipstream. The Symposium was convened to promote energy efficiency programs available for Tribes, identify Tribal government needs and goals that relate to energy, and identify the most efficient way to participate in existing programs. The Symposium was positively received by participants. A second Tribal Nation Energy Symposium was hosted by the Forest County Potawatomi Community (FCPC) in autumn of 2023 to build upon on the work of the spring 2023 event. The second symposium focused on information sharing about grant

opportunities, energy planning, and heat pump technology. It also included a tour of the FCPC buildings with renewable energy facilities.

Given the success of these events, the State of Wisconsin commits to hosting a Tribal Energy Symposium in 2025 on the topic of IRA Home Energy Rebates in Wisconsin and how to increase access and participation in the HEAR program.

Ongoing Engagement with Wisconsin's Energy Workforce

Focus on Energy has fostered relationships with its Trade Ally contractor network over time. These valuable contractors and service providers are qualified to partner with Focus to deliver energy efficiency and renewable products (mostly solar) and expertise directly to Wisconsin residents. Focus on Energy promotes the diversity of its contractor network by allowing each Trade Ally to self-identify as a Minority Business Enterprise (MBE), a Women-Owned Business Enterprise (WBE), or a Disabled Veteran Business (DVB). Additionally, the program asks contractors whether they are able to provide Spanish as a spoken language for customers. Interested program participants can search for qualified contractors identifying themselves by these aforementioned statuses using the Focus on Energy "Find a Trade Ally Tool" on the program website.

Additionally, Focus provides Trade Ally contractors with information materials on current rebates available to customers through Focus, access to building science and new technology training opportunities, and updates on market trends and cutting-edge technologies entering the state market. The State of Wisconsin plans to use this same delivery framework to share information about the IRA HEAR program to Trade Ally contractors.

Focus maintains regular contact with its Trade Ally contractor network through emails and newsletters as well as annual Trade Ally breakfasts held throughout the state. Through these channels Focus shares incentive updates and news about changes to the industry, such as the HEAR rebate program.

While some Trade Ally contractors are union members, it is not a requirement of the program. However, in the past few years two notable engagements with union contractors have emerged. Green Homeowners United, a union contractor and Trade Ally, are vocal advocates for the program and provide Focus with feedback on field trends, emerging technology, and solutions to traditional barriers to program participation. In late spring of 2023, Green Homeowners United invited Focus staff to attend an event at the Laborers' International Union of North America (LIUNA) training facility, regarding preparing a green workforce for the IRA rebates. Several organizations agreed to ongoing partnership to share information and collaborate, including Focus on Energy, Revitalize Milwaukee, Wisconsin Department of Health & Safety's Lead Safe Homes Program, Dane County Office of Energy & Climate Change, Laborers' Union, and others. The State of Wisconsin plans to continue engaging with these groups and communicate opportunities that the HEAR rebates can present once available.

Coordination with Low-Income Weatherization Assistance Program: Wisconsin's Department of Administration's Division of Energy, Housing, and Community Resources (DEHCR)

In preparation for this program, the PSC and Focus staff conducted outreach and coordination with the Wisconsin Department of Administration's Department of Energy, Housing, and Community Resources (DEHCR). DEHCR administers Wisconsin's Home Energy Assistance Program (WHEAP), Weatherization Assistance Program (WAP) and Home Energy Plus (HE+) Program Services. The outreach and coordination efforts were undertaken to explore opportunities to integrate HEAR program opportunities

to benefit low-income residents of the state who may also be participating in other federal low-income energy assistance programs. PSC and Focus staff have established recurring coordination meetings with DEHCR staff. The State of Wisconsin commits to continued engagement and partnership with DEHCR throughout the planning, design, and implementation of the HEAR program. Specific commitments for this coordination include:

- Coordination meetings (at least quarterly) to discuss program performance and identify opportunities for enhanced collaboration and process improvements.
- Exploring the needs for, and parameters of, one or more agreements (e.g., Memorandum of Understanding) between the PSC and DEHCR to support efficient program integration between the HEAR program and WAP.

For future engagement, the State of Wisconsin will focus on partnerships with trusted community nonprofits, Community Action Agencies (CAAs) (funded by DEHCR), rural electric municipal and cooperative utilities, and landlord associations that overlap with DAC territories and rural areas of the state to ensure that marketing and outreach of the HEAR program is targeted to DACs and customers heating and cooking with delivered fuels. CAAs implement the Weatherization Assistance Program in the state and can offer referrals to households that are good candidates for HEAR. The State of Wisconsin will work with these CAAs to encourage referrals to households located in DACs to deliver the energy efficiency and electrification benefits that the HEAR program can offer to these communities.

The State of Wisconsin has established a strategic objective to target HEAR programming toward households throughout the state that rely on delivered fuels as their primary heating source. These households tend to be located in rural areas and may also overlap with DACs. The following factors have contributed toward the State of Wisconsin establishing this strategic objective:

- Customers that rely on delivered fuel as their primary heating source are more likely to spend a greater portion of their income to heat their home than customers with natural gas service. As a result, these households are less likely to experience increased energy costs when electrifying their space and water heating equipment.
- Customers that rely on delivered fuel as their primary heating source are likely to experience greater volatility in the cost to heat their homes compared to customers relying on other fuels.
- Customers that rely on delivered fuel as their primary heating source are not eligible for Focus rebates when fuel switching from delivered fuels to electricity. HEAR rebates may help to address a market gap.
- Customers served by municipal utilities and electric cooperatives have lower electric rates, on average, compared to customers of investor-owned utilities.

Future Community and Labor Stakeholder Engagement

The section below outlines some of the community partners that have already been identified – whether by previous engagement with Focus, the PSC, or through referrals from partners – that will be key to distributing IRA HEAR program rebates equitably in Wisconsin. The list is not intended to be comprehensive. The State of Wisconsin recognizes that as staff engage these partners, utilities, local governments, and other stakeholders and that as awareness of the HEAR program grows, more organizations and stakeholders will emerge as important partners. As a separate but related effort, Focus is in the process of analyzing and understanding which customers have historically been underserved by the program. As a result of this research, it is anticipated that Focus staff will seek new

partnerships to boost participation in both Focus and HEAR programs in these geographic areas of underserved communities.

In addition to this targeted outreach, the State of Wisconsin held multiple public input sessions as part of planning for the IRA Home Energy Rebate programs. The dates of these sessions are presented in the table below. In-person and virtual attendance options were provided, with Spanish translation provided at some locations for accessibility, to provide educational information about the benefits of these programs to interested stakeholders. Locations for public input sessions were determined based on local government feedback that these should be held across the state, located in or near Justice40 disadvantaged communities, and accessible by multiple forms of transportation. Local governments also provided a list of CBOs to invite to participate and recruit community members to attend. An online survey was also developed to gather public feedback on key program design elements. The feedback collected from local governments, contractors, community-based organizations, and residents was used to inform the final design of the HEAR rebate program and is included in this CBP to ensure that the funds will benefit the communities that are served. Many of the stakeholders mentioned in this CBP were invited to attend these events or at a minimum, provide their feedback via online survey.

Through Wisconsin’s public engagement process, staff engaged over 590 individuals and entities (not including contractors) to provide feedback on program design. A breakdown of participation can be found in the table below.

Table 1: Participation by Event and Outreach Platform

In-Person Session Summary			
City	Date/Time	Location	Attendees
Green Bay	Tuesday, January 23, 2024 1:30-3:30 pm	Brown County Central Library	34
Milwaukee (North)	Thursday, January 25, 2024 6-8 pm	Washington Senior Center	13
Milwaukee (South)	Thursday, January 25, 2024 6-8 pm	Urban Stables	12
Madison	Tuesday, January 30, 2024 6-8 pm	Village on Park	27
Viroqua	Monday, February 12, 2024 6-8 pm	Vernon County Museum	31
Ashland	Tuesday, February 20, 2024 6-8 pm	Blue Wave Inn & The Sandbar	40
		<i>In-person Session Total</i>	<i>157</i>
Virtual Session Summary			
Virtual #1	Thursday, February 8, 2024 6-7:30 pm		81
Virtual #2	Monday, February 26, 2024 6-7:30 pm		101
		Virtual Session Total	182
Online Survey Summary			
	Available January 2, 2024 – February 29, 2024		253

For residential in-person and virtual engagement sessions, attendees were provided a presentation overview of the IRA Home Energy Rebates before input was collected through facilitated small group discussions. During these discussions, the following questions, which were similar to the online survey prompts, were asked:²

1. What best describes you? (Resident, trade ally, and/or community or promotional partner)
2. What equipment would you be interested in installing in your home?
3. Who do you trust most to learn about improving your home or reducing your energy use?
4. When making home energy upgrades, which three factors are most important to you?
5. How familiar are you with income qualification and the area median income?
6. What approach would you recommend for Wisconsin:
 - a. Offer moderate rebates to enable more households to participate
 - b. Increase rebate amounts for low-income and/or energy burdened households
 - c. Offer DOE-defined maximum rebates for all equipment
 - d. No preference
7. Which approach would you prefer Wisconsin use in structuring its IRA Home Energy Rebate programs?
 - a. Make IRA rebates available to as many Wisconsin households as possible
 - b. Prioritize serving households with incomes below a certain level
 - c. Prioritize households that currently cannot take advantage of Focus on Energy
 - d. No preference
8. Do you have suggestions on how Wisconsin's IRA Home Energy Rebates can best reach DACs, high energy burdened customers, and/or low-income communities?
9. How restrictive should Wisconsin be on retroactivity?
10. Do you plan to participate?

For Trade Ally contractor feedback, more than 450 contractors registered to attend input sessions across the state. The dates and locations of these engagements can be found in the table below:

Focus on Energy Sponsored Breakfasts – 459 Registered Attendees	
City	Date
Green Bay	
Wausau	Wednesday, January 24, 2024
Milwaukee	
Pewaukee	Friday, January 26, 2024
Madison	
Xcel Energy Sponsored Breakfasts	
Onalaska	Tuesday, February 13, 2024
Eau Claire	Thursday, February 15, 2024
Ashland	Wednesday, February 21, 2024

² The questions listed here are not exhaustive nor worded verbatim, but rather are summarized here for brevity. For an unabridged version of questions, asked in the precise wording in which they were posed, please refer to the Stakeholder Outreach Summary.

Trade ally contractors were asked:

1. Will your company participate in the IRA Home Energy Rebate programs?
2. Would your company be interested in working in DACs, if there were funding to support bonuses for projects completed there?
3. Does your company currently assist with income verification?
4. Do you agree with requiring envelope improvements be completed before HVAC upgrades?
5. Do you have any other thoughts to share regarding retroactivity?

Below is a summary of themes heard from stakeholder groups. A detailed review of feedback provided from stakeholder feedback sessions can be found in the Stakeholder Outreach Engagement Summary included as a separate document in this application.

Themes from Public Engagement Events (including in-person, virtual, and online survey responses):

- Insulation and air sealing projects were of highest interest to potential program participants, followed by heat pumps for space heating and cooling and heat pump water heaters.
- Focus on Energy is the most trusted information source for residents to learn about home energy projects or reducing their energy use.
- Saving money is the most important factor for why residents in Wisconsin make home energy upgrades, followed by reducing energy use.
- Overall, residents are only somewhat familiar with area-median income to determine whether their household is eligible.
- Overall, responses were nearly equally split amongst those engaged that said they preferred the State of Wisconsin to offer low-to-moderate rebate amounts to serve as many households as possible versus prioritize households with lower incomes and high energy burden.
- Participants stressed the importance of partnering with community-based organizations to spread awareness of the program when available.
- Participants stressed the opportunity of partnering with the state Weatherization Assistance Program providers to deliver these funds to those that could benefit the most.
- Participants stressed the need to engage landlords to ensure that renters are not left out from benefiting from the IRA HER programs.
- Many Wisconsinites expressed interest in participating in the program immediately or within 3 years of the program being available. Customer excitement for these IRA HER programs is very high.
- Rural customers expressed serious concern of contractor availability – especially for energy assessors – in their area and the lack of contractors could exclude their ability to access these funds.
- Cost of energy assessments were raised as a potential barrier to participation.

Themes from Trade Ally Engagement Events (including in-person and online survey responses):

- Most Trade Allies responded that they would likely participate in IRA HER Programs. Trade Allies stated that the reason for their affirmative answer was the opportunity to reach underserved and low-income communities with instant rebates. Trade Allies noted that this is also an opportunity to expand their customer base due to demand in the marketplace.
- Trade Allies who stated they were not likely to participate cited federal program “red tape” and the perception that there will be too many roadblocks to deliver the rebates to customers. Income qualification liability, federal audits at the contractor level, income approval wait times, and cashflow concerns were also common themes heard at multiple sessions.
- Material and labor scarcity in Northern Wisconsin may be a participation barrier.
- All Trade Allies seemed to agree that retroactivity, in some form, is necessary given high market awareness of energy efficiency programs set to launch because of the Inflation Reduction Act.
- Trade Allies were not in agreement whether envelope improvements should be required to be completed before HVAC upgrades. Trade Allies who did not agree stated they disagreed in instances where health and safety would not allow envelope work to be completed first or when envelope work is not deemed necessary due to adequate condition of existing materials.
- Trade Allies stressed the importance of determining program requirements in all areas as soon as possible to allow them to prepare adequately for program launch. Insulation Installers and Home Energy Assessors both voiced the need to have a complete set of rules surrounding the energy assessments required for this program as soon as possible to allow businesses to learn the software tools. It was suggested that once program design and requirements have been finalized, a training course would be helpful for Trade Ally contractors.
- Trade Allies who work in rural Wisconsin expressed interest in being able to provide rebates to customers on delivered fuels. They suggested that working with electric utilities and delivered fuel providers would be the best way to reach this historically underserved population.

The State of Wisconsin intends to maintain open and transparent engagement with its community and labor stakeholders throughout the planning, implementation, and evaluation phases of the AR program. The State of Wisconsin anticipates a stakeholder engagement approach (e.g., type and frequency of the engagement) that is customized to the needs of the stakeholder group. Community and labor organizations that have been identified as key stakeholders to engage with to ensure that the benefits of the HEAR program go to the communities that need them most are discussed in the sections below. Additional stakeholder organizations may be identified and included in the state’s outreach and engagement strategy during future program phases.

Community Stakeholders to be Engaged:

Outreach and engagement to community and labor stakeholders will vary, but the majority of outreach to community stakeholders will likely be one-on-one meetings and discussions to build trust and value the unique perspectives and networks that each group can provide to ensure their community benefits from the AR program. Some, but not all community stakeholders that Wisconsin will engage are

mentioned below. Added context is provided for some organizations that have not been mentioned before or who's mission or role may not be self-explanatory.

- Wisconsin Local Government Climate Coalition (WLGCC)
- Focus on Energy Partnered Community-Based Organizations
- Vernon County Energy District
- DNR Green Tier Legacy Communities
- Reclaiming Our Neighborhoods (RON) Coalition (Milwaukee)
- Sheboygan Housing Coalition
- UMOS (Milwaukee), Centro Hispano (Milwaukee & Dane Counties), Wi EcoLatinos (Dane, Rock, & Columbia Counties), Dane County Latino Academy of Workforce Development
 - These groups will provide insight on program design and marketing materials intended for Spanish speaking audiences, and can potentially provide referrals for Spanish speaking contractors to become Trade Allies.
- Hmong American Partnership (Appleton) and Hmong American Center (Wausau)
 - These groups can provide insight on program design and marketing materials intended for Hmong speaking audiences and can potentially provide referrals for Hmong speaking contractors to become Trade Allies.
- 16th Street Community Health Center (Milwaukee)
 - This group is a strong partner of the City of Milwaukee's Environmental Collaboration Office on environmental programming, but are also a strong CBO in their area of Milwaukee. Intended outcomes of engagement would be that this organization would understand the new and existing efficiency programs - and the potential health benefits of electrification - to connect and support residents in their community to participate.
- Habitat for Humanity (chapters across the state) & Revitalize Milwaukee
 - Both organizations complete home improvement and repair projects for residents with low-to-moderate incomes. In various forms, these groups are already installing or doing work adjacent to health and efficiency in the homes they work in. An intended outcome of engagement will be to make sure that these organizations are aware, and when appropriate implement projects using federal and state funds, to improve the lives of those living in the housing that they support.
- Community Action Program (CAP) agencies that implement Weatherization Assistance Programs, specifically those in high energy burdened counties with high propane or poverty levels. This outreach will be done in conjunction with DEHCR and is anticipated to include: CouleeCAP, Social Development Commission, Western Dairyland CAP, North Central CAP, West Central CAP, Central WI CAP, and Ashland County Housing Authority CAP.
 - Beyond just the coordination with the WI Department of Administration / Division of Energy, Housing and Community Resources on Weatherization Assistance Program, the intended outcome of this engagement would be a concerted effort to ensure partnerships and projects are completed with weatherization implementers in areas of the state that face the highest energy burdens.
- Walnut Way / Lindsay Heights Neighborhood Improvement District, Sherman Park ECO Neighborhood, Northwest Side Community Development Corporation, and Citizens Action WI
 - These are neighborhood groups or community leaders (outside of RON Coalition) that serve Milwaukee residents that are energy burdened and in disadvantaged

communities. Intended outcomes of engagement with this group would be that they can connect and refer residents in disadvantaged communities with energy burdens to participate in the AR program, as well as participate in workforce pipeline to diversify workforce as opportunities arise.

- Blacks for Political and Social Action
 - To partner with an organization that serves the BIPOC community of the Madison-metro area that could share awareness of these programs and the benefits of participation in their community.
- Wisconsin Apartment Association, as well as [regional apartment associations](#)
- Wisconsin Association of Housing Authorities
- Wisconsin Department of Public Health – Asthma Team
- Wisconsin Housing and Economic Development Authority (WHEDA)

Labor Groups to be Engaged:

Wisconsin will continue to engage the state’s clean energy workforce through Focus’ Trade Ally contractor network. Focus will routinely communicate and seek contractor input on program design elements as well as recruit existing Trade Ally contractors to implement the HEAR rebates as Registered Contractors.

In addition, the State of Wisconsin will build or expand upon existing relationships with the following labor groups, likely through one-on-one conversations and meetings:

Plumbing, Heating, Cooling Contractors of Wisconsin

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

Wisconsin Chapter of National Electric Contractor Association

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

IBEW Locals 127, 890, 965, 388, 953, 577, 2150

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

LiUNA WI Laborers’ District Council

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

BlueGreen Alliance, WI

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

Investing in Job Quality and a Skilled Workforce

As described in the above section, Focus has fostered relationships with its Trade Ally contractor network over time. Focus promotes the diversity of its contractor network and provides Trade Ally Contractors with training opportunities and updates on market trends and cutting-edge technologies entering the state market. The State of Wisconsin's Office of Energy Innovation (OEI) applied for an IRA Section 50123 Contractor Training Grant and has provided U.S. DOE the application, program scope, and implementation plan for that funding. The State of Wisconsin plans to use those funds to invest in quality jobs and a skilled workforce capable of implementing the work needed to meet the goals of the HEAR program, and some details of that program are provided in this section.

Training for Residential Energy Contractors (TREC)

The OEI submitted a plan to DOE for the use of grant funds under the IRA Section 50123 funding opportunity and plans to use those funds to provide training grants to eligible entities, including organizations like technical colleges and other U.S. Department of Energy (DOE) approved certified training entities, to meet workforce training and certification needs across the state. This implementation plan was developed through discussions with key stakeholders including the Wisconsin Department of Workforce Development (DWD), the Wisconsin Technical College System (WTCS) and others. OEI staff met several times with key DWD staff to discuss the energy workforce needs of the state. DWD provided OEI with data projections and consulted on the approach to its TREC grant application. The identified needs have been factored into the planned program design, which would create and launch a grant program to provide funds to eligible entities that are DOE certified and experts in the workforce landscape of various Wisconsin communities. Through initial outreach, OEI has already identified 36 potential training locations, with outreach to other prospective applicants underway, that could apply for funds through this program to provide certification and training to new workers or upskill existing workers.

Through existing programs, OEI has a history of working with private entities, including contractors, in program implementation. As part of the TREC-funded program, OEI will design and convene a Workforce Advisory Group to help shape the direction of the program funded through TREC. This advisory group will be composed of subgrantees and contractors, and their contributions will help shape the design and direction of the program in order to meet changing workforce demands. As members of the Workforce Advisory Group and stakeholders engaged throughout the program's development, employers will have an opportunity to build relationships with the OEI and training partners. In helping to connect trainees with job opportunities, employers will have the opportunity to provide feedback and critical data on job quality and pay that can help shape program design and training needs. Focus on Energy staff working on the delivery of HEAR will participate as members of the TREC Advisory Group to ensure its efforts are well coordinated with workforce needs of the HEAR program. In addition, through

its connection to OEI, Focus will share information on funded training grant programs with its Trade Ally Network and CBOs that are interested in creating their own local workforce to encourage ongoing learning and development for workers on HEAR funded projects.

In 2026, the State of Wisconsin commits to identifying Justice40 DACs that have low participation rates in the IRA Home Energy Rebates due to contractor availability. Contractor availability can be quantified by a 100-mile radius from a IRA Home Energy Rebates Registered Contractor. The State of Wisconsin commits to coordinating with the 50123 TREC effort to train contractors in these areas to reduce barriers to participation in these areas. As part of the implementation of this HEAR program, the State of Wisconsin also commits to coordinating job training opportunities through TREC and communicating these opportunities to HEAR program participants that have self-selected (through post-participation satisfaction survey) to be kept apprised of job training opportunities in the clean energy workforce. These efforts will help the State of Wisconsin ensure the Wisconsin TREC program is doing outreach, engaging with, and training contractors in areas of the state that need certified and trained workers to implement the HEAR and HEAR programs.

Labor Relations

The historic levels of federal funding available through the Home Energy Rebate programs will encourage not only new workers, but quality jobs in a range of careers. The State of Wisconsin and Focus pledge to remain neutral during any union organizing campaigns, and allow union organizers access to outreach events and appropriate onsite non-workplaces. As part of the TREC funded program described in section Training for Residential Energy Contractors above, OEI plans to work with DWD to monitor job data in the Energy Auditor, HVAC Contractor, Plumbing, Electrical, and Home Performance Contractor sectors, gathering data on both job quality and quantity.

As discussed in the Engage Community and Labor section, Focus has plans to engage further with Labor groups including LiUNA and IBEW Local branches on both the TREC program as well as to connect with jobseekers that have participated in the HEAR program. Likewise, as the clean energy workforce grows and changes in response to the HEAR program, the State of Wisconsin commits to sharing these trends with the Wisconsin Department of Workforce Development in order to ensure momentum in the industry continues to evolve during and after this program.

Diversity, Equity, Inclusion, and Accessibility

The State of Wisconsin is committed to incorporating diversity, equity, inclusion, and accessibility (DEIA) objectives into the HEAR program plan, design, and implementation. Below is a description of the State of Wisconsin's commitments to DEIA in these areas.

Commitment 1: The State of Wisconsin commits to partnering with Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and Veteran Owned Businesses for contractor support needs to deliver the HEAR program. Specifically, the State of Wisconsin commits to the following:

Commitment 1.1: The State of Wisconsin commits to providing customers with information and tools to support a diverse choice of contractors from a variety of backgrounds, including a choice of a contractor that is a: Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and/or Veteran Owned Businesses, and/or Spanish-speaking contractors to serve customers' needs.

Summary of scope of work: Focus has statewide network of Trade Ally contractors and currently allows these contractors to self-identify in the categories listed above. Customers can then filter contractors on the “Find A Trade Ally Tool” based on these DEIA categories that are located within their proximity. The State of Wisconsin commits to continuing – and expanding – this work for residents of Wisconsin to be able to search for IRA Home Energy Rebates Registered Contractors with these same DEIA designations

Commitment 2.1: The State of Wisconsin commits to increase IRA Home Energy Rebates Registered Contractors that either identify as a Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and Veteran Owned Businesses, or Spanish-speaking services offered or that serve predominantly DAC(s) per year. These contractors would be searchable on the Find a Trade Ally Tool as eligible installers of HEAR program work. The State of Wisconsin has a goal of recruiting at least 10 such new IRA Home Energy Rebates Registered Contractors in the first year of the HEAR program, with a goal of recruiting 5 new contractors in subsequent years of the program. **Summary of scope of work:** Focus will engage with community partners, such as CBOs, local governments, utilities, and labor groups to identify and recruit eligible contractors and engage them in the standard training process necessary to be added to the program’s list of qualified contractors. Connections to newly trained staff through other efforts such as the TREC program discussed in Training for Residential Energy Contractors may provide pathways to recruiting from new groups that will assist in meeting these goals.

Commitment 3.1: The State of Wisconsin commits to partnering with at least 2 technical colleges in the state to educate them on the technologies eligible for HEAR rebates and encourage them to offer curriculum to support the state’s clean energy workforce.

Summary of scope of work: OEI has begun and will continue to reach out to technical colleges, explain the HEAR program and eligible technologies and pathways to achieve rebates, as well as market impacts, and encourage technical colleges to start or bolster their clean technologies education curriculum. This will be done in conjunction with the TREC funded program discussed in Section Training for Residential Energy Contractors.

Commitment 2. The State of Wisconsin commits to implementing a plan to improve access to clean energy industry supporting jobs for local and underrepresented workers, including DAC residents, those with disabilities, returning citizens, opportunity youth, and veterans.

Commitment 2.1: The State of Wisconsin will work to develop a partnership with pre-apprenticeship or apprenticeship readiness programs to foster improved access for underrepresented workers to jobs.

Name of readiness program/s:

- IBEW 195 apprenticeship program
- [Wisconsin Electrical Apprenticeship & Training Program](#)
- Wisconsin Plumbers Union Local 75 Apprenticeship Program

Scope of Work: Focus will engage with community partners, such as CBOs, local governments, utilities, Wisconsin Department of Workforce Development, and union labor groups (listed previously) to identify and recruit eligible jobseekers and past participants of HEAR and connect them with union energy-related career paths. This strategy will begin with and will be based off early discussions with union labor groups, as its scope will be dependent on union halls’ ability to absorb and recruit new workforce participants. That said, in workforce-related efforts

regarding the IRA Home Energy Rebates, the State commits to including union career paths as options when connecting jobseekers to opportunities that arise from this funding.

Commitment 2.2: The State of Wisconsin will partner with training and placement programs [other than apprenticeship programs] for underrepresented workers.

Name of training and placement programs:

- Wisconsin Department of Workforce Development
- Building Science and Energy Management Program – Associate degree at Western Technical College
- Sustainable Energy Management Program – Associate degree at Southwestern Technical College

Scope of Work: Much like the scope of work described in Commitment E2.1, Focus will engage with community partners, such CBOs, local governments, utilities, Wisconsin Department of Workforce Development, and union labor groups (listed previously) to identify and recruit eligible jobseekers and past participants of HEAR and connect them with non-union energy-related career paths. This strategy will begin with and will be based off early discussions with technical colleges, as its scope will be dependent on union halls' ability to absorb and recruit new workforce participants. That said, in workforce-related efforts regarding the IRA Home Energy Rebates, the State commits to including non-union career paths as options when connecting jobseekers to opportunities that arise from this funding.

Justice40 Initiative

The Wisconsin HEAR program will [PENDING COMMISSION DECISION] define DACs as those communities corresponding to the US DOE's CEJST boundaries. The program design and delivery will quantify and track the project benefits that flow to residents of these areas. Many of these metrics were stated in the Purpose and Introduction section after the SMART goals for the program were outlined. The program will measure benefits flowing to these communities from projects completed at buildings located in these communities. Program spend will also be an important metric to measure and track to ensure that the HEAR program benefits DACs. The State of Wisconsin will track multiple forms of benefits to DACs through its rebate tracking and processing system and through program evaluation activities. The State of Wisconsin will use these processes to actively monitor program performance and ensure that applicable benefits flow to DACs.

Encouraging delivery of home electrification rebates to disadvantaged communities: The Wisconsin HEAR program will increase the ability of low-income households to overcome the barrier of upfront costs of energy efficient technology by encouraging eligible participants to stack HEAR rebates with rebates offered through Focus and other funding sources as appropriate. The State of Wisconsin will implement strategies to encourage participation, and therefore the benefits of the HEAR program, to disadvantaged communities.

The State of Wisconsin is working on the development of project application materials to easily qualify residents in DACs for rebates. Focus will use metrics to track and report on benefits that are delivered in DACs including:

- Number of projects completed in Justice40 DACs.
- HEAR rebate spend (total dollar amount and proportion of program spend) for projects completed in Justice40 DACs.
- Estimated energy savings from projects completed in Justice40 DACs.

The State of Wisconsin plans to make income verification for the HEAR program as easy as reasonably possible to enable participants to receive the maximum rebates for which they are eligible. The State of Wisconsin intends to leverage existing Focus processes and procedures in the income-qualification process to facilitate an understandable and user-friendly experience. Details of Focus's existing process are described below.

Focus has offered higher incentives to income-qualified residential customers for many years. Beginning January 2024, Focus modified its income qualification process to better align with the IRA HOMES and HEAR criteria. With this modification, Focus transitioned from using state median income (SMI) as the basis for determining customer income eligibility to using AMI. Two other major changes in 2024 include allowing self-attestation and nearly instantaneous approval through the online form. Focus had already established processes to allow categorical eligibility for its income-qualified incentives. Customers that are verified as already qualified for the state and federal means-tested programs listed below can receive Focus's higher incentive amounts:

- Wisconsin Home Energy Assistance Program (WHEAP)
- Supplemental Nutrition Assistance Program (SNAP/FoodShare)
- Lifeline Support for Affordable Communications (Lifeline)
- National School Lunch Program – Free (NSLP)
- Housing Opportunities for Persons with AIDS
- Weatherization Assistance Program (WAP)
- Medicaid

- Wisconsin Head Start
- Food Distribution Program on Indian Reservations (FDPIR)
- Housing Improvement Program (HIP)
- Supplemental Security Income (SSI)

For households that are not categorically eligible under one of the aforementioned programs, the Focus program offers an express eligibility option where customers can provide the first two pages of the most recent year's tax form 1040 for each member of the household that earns income. Absent that, Focus will also accept the most recent 30-day proof of income for each member of the household that earns income. This tiered eligibility approach allows participants to verify income via the least time-intensive and burdensome routes available to them. To reiterate, the State of Wisconsin intends to build upon this experience of creating user-friendly income verification processes to reduce barriers in disadvantaged, overburdened communities.

The State of Wisconsin will also partner with electric utilities serving rural areas of the state to educate customers on the health, comfort, environmental, and economic benefits of electrifying those appliances in their home that use delivered fuel. Aligning this CBP with the strategic objectives (listed in Section B) outlined by the PSC, targeting our outreach with municipal and cooperative utilities, including those that have not participated in Focus on Energy historically, will ensure that the benefits of HEAR funds go households that can benefit the most.

The State of Wisconsin will prioritize building relationships with CBOs in energy burdened and disadvantaged communities. These organizations can serve an important role as promotional partners for the program. Working with trusted community leaders in DACs will be an important strategy for encouraging households located in these communities to participate, especially if they have limited familiarity with energy efficiency programs to date. The State will also prioritize distributing marketing collateral and performing partnership outreach to neighborhood associations located in DACs to spread awareness during the program's early stages, to give households time to plan for energy projects that were previously financially out of their reach. Moreover, the State will engage landlord associations and tenant advocacy groups to explain the program's benefits and the participation pathways available for low-income multifamily housing.

The State of Wisconsin and Focus will track contractor engagement with households located in DACs to determine the amount of program funds flowing to those communities. The program will provide Registered Contractors a **PENDING COMMISSION DECISION** bonus for each project or dwelling unit located in a Justice40 DAC upon completion and verification of the work done. The State of Wisconsin will develop a publicly available list of Registered Contractors. Only those Registered Contractors that have been approved by the State prior to completing the project will be eligible for the DAC bonus incentive. The State of Wisconsin is planning to use the Pacific Northwest National Laboratory (PNNL) Application Programming Interface (API) tool to verify whether the address corresponding to project location is within a DAC prior to approving payment of the DAC contractor bonus incentive. DAC contractor bonus incentives will be tracked in the State's rebate tracking system. For reporting purposes, each DAC Registered Contractor bonus incentive in the rebate tracking system will include a project identification field to allow the State to identify the HEAR project corresponding to the DAC contractor bonus incentive, and vice versa.

Ensuring applicable benefits from the HEAR program flow to DACs:

While not all low-income households are located in DACs, a good proportion of DACs are located in census tracts with average household incomes below the state and county median incomes. By reserving [PENDING COMMISSION DECISION] % of HEAR rebate funds for low-income households and multifamily tenants ([PENDING COMMISSION DECISION] % and [PENDING COMMISSION DECISION] %, respectively), the State of Wisconsin is prioritizing the flow of benefits to households that have faced the highest barriers to participating in existing efficiency programs in the state. The State's outreach and marketing of the program, outlined in Section F1 above and the Education and Outreach Strategy Blueprint is designed to encourage HEAR program participation among households in DACs.

Wisconsin will conduct evaluations to assess the flow of benefits to DACs and measure and report progress toward the goal of ensuring at least 40% of program funding is directed toward projects occurring in DACs. The performance metrics outlined in Section F1 above will be used to indicate whether the state is on track to meet this goal as well as the goal to spend at least [PENDING COMMISSION DECISION] % of rebate funds on projects for low-income households. It is the state's goal to target outreach and participation of the HEAR program in DACs prior to and at program launch. Regular tracking and reporting of program performance will provide the state with visibility of its progress toward ensuring an appropriate level of benefits are flowing to DACs and allow the state to adapt its program delivery strategies if metrics are not meeting expectations and goals mentioned in this plan.

Below is a list of benefits the State of Wisconsin will ensure flow to DACs as a result of the HEAR program:

Benefit 1: Decrease in Energy Burden: Energy burden is defined as the percent of household income that is put toward home energy costs. Often, a household is considered "energy burdened" when 6 percent or more of their income is spent on their utility bill(s). The activities in this program will improve home efficiency and reduce energy use, resulting in lower utility bills and decreased energy burdens.

DAC that will benefit: All DACs in Wisconsin will be prioritized for this benefit.

How benefit will be delivered: The primary benefit to be delivered are direct benefits in the form of reduced energy usage resulting in reduced home energy costs. These benefits will be delivered from a combination of program partners including the program administration and implementation team, the program's contractor partner network, CBOs, and state and local governments.

When benefit will be delivered: The benefit of reduced energy usage and costs will be delivered immediately upon completion of a project. These benefits will continue to be delivered to the resident throughout the useful lives of the measures installed.

Milestones toward benefit delivery: Key milestones toward benefit delivery include:

- As mentioned in the SMART goals table, develop a list of qualified contractors available to serve residents in DACs and ensuring that this list is easily accessible to potential program participants.
- Development and dissemination of targeted outreach, education, and promotional materials with CBOs in Justice40 DACs.
- Development of project application materials to easily qualify residents of DACs for rebates. Metrics on benefits to track and report when evaluating program include:
 - Number of projects completed in DACs.
 - Number of projects completed in census tracts with high energy burdens.
 - Estimated energy savings from projects completed in DACs.

- Estimated energy savings from projects completed in census tracts with high energy burdens.
- Customer satisfaction with program.
- Customer self-reported energy bill impacts.

Community-based organization(s) to be engaged with when delivering this benefit:

- Aging & Disability Resource Center (ADRC) of Brown County
- Habitat for Humanity – Green Bay
- Neighborworks Green Bay
- House of Hope Green Bay, Inc.
- Paul’s Pantry (Green Bay)
- Century City Triangle Neighborhood (Milwaukee Northside)
- Walnut Way Conservation Corps & Lindsay Heights Neighborhood (Milwaukee Northside)
- Citizen Action WI – Energy Burden Coordinator (Milwaukee Northside)
- Northwest Side Community Development Corporation (Milwaukee Northside)
- Dominican Center (Milwaukee Northside)
- Social Development Corporation (Milwaukee Northside)
- Serving Older Adults, Inc. (Milwaukee North & Southsides)
- Harbor District (Milwaukee Southside)
- 16th Street Health Center (Milwaukee Southside)
- Muskego Way Forward (Milwaukee Southside)
- VIA CDC (Milwaukee Southside)
- UMOS (Milwaukee Southside)
- Revitalize Milwaukee (Milwaukee Southside)
- Reclaim our Neighborhoods (Milwaukee)
- Blacks for Political and Social Action (Madison)
- EcoLatinos (Madison)
- Operation Fresh Start (Madison)
- Sustain Dane (Madison)
- Tenant Resource Center (Madison)
- Urban Triage (Madison)
- Foundation for Black Women’s Wellness (Madison)
- Latino Health Council (Madison)
- Centro Hispano (Madison)
- Latino Academy for Workforce Development (Madison)
- Project Home (Madison)
- Catholic Multicultural Center (Madison)
- Elevate (Madison)
- Urban League of Greater Madison
- CouleeCAP (SE Wisconsin)
- Habitat for Humanity La Crosse (SE Wisconsin)
- Vernon County Energy District
- Living Faith Food Pantry (Viroqua/Vernon County)
- Bethel Butikk Food Pantry and Thrift Shop (Viroqua/Vernon County)
- CORE Community Resources (Bayfield County)

- Cheq Bay Renewables (Bayfield and Ashland Counties)
- Ashland County Aging Unit Inc.
- Ashland Cares Inc.
- Faith in Action Ashland

Benefit 2: A decrease in environmental exposure and burdens: Emissions reduction and associated health benefits of energy efficiency and particularly, with electrification (improved respiratory health and reduced exposure to extreme temperatures and weather).

DAC that will benefit: All DACs in Wisconsin will be prioritized for this benefit.

How benefit will be delivered: The benefit will be delivered to the customer upon project completion, as energy efficiency projects, particularly those that include induction stove installations and weatherization measures, can lead to improved indoor air quality and ventilation, improved respiratory health, and reduced risk of mold and moisture-related hazards.

When benefit will be delivered: The benefits of decreased environmental exposures and burdens will be delivered immediately upon project completion. These benefits will continue to be delivered to the resident(s) throughout the useful lives of the measures installed. Specifically, induction stove technology has the potential to improve indoor air quality when replacing natural gas.

Milestones toward benefit delivery: Development of project application materials to easily qualify residents of DACs for rebates. Metrics to track and report on benefits:

- Number of projects completed in DACs.
- Estimated energy savings from projects completed in DACs.

Metrics to track and report on benefits: Wisconsin intends to use the EPA's AVOIDed Emissions and geneRation Tool (AVERT) and Co-Benefits Risk Assessment (COBRA) tool to quantify, track, and report the avoided emissions and health benefits attributable to the program.

Community-based organization(s) to be engaged with in delivering this benefit: See the list of CBOs listed in Sections F1 and C2. In addition, the State of Wisconsin commits to exploring partnership and referral opportunities with the Wisconsin Department of Health and Safety (DHS) Asthma Prevention Team to promote the program to families with records of childhood asthma cases. In preliminary conversations, DHS has shared that induction stoves are a technology they promote to low-income households with known childhood asthma cases, but cost has so far proved a barrier. DHS has expressed an interest in promoting induction stove technologies and the respective HEAR program to deliver the benefits of the technology to households that could benefit the most. The State of Wisconsin also commits to ongoing outreach to new CBOs, such as community health clinics and centers, that are engaged in similar work in other DACs throughout the state.

Benefit 3: An increase in quality job creation, the clean energy job pipeline, and job training for individuals: The Wisconsin HEAR program will serve as a catalyst to supporting a growing clean energy workforce in the state. A strategic program objective is to support long-term workforce development opportunities and leverage IRA contractor training grant funding where possible.

DAC that will benefit: Uncertain at this time, but will be refined, targeted, and reported on as 50123 TREC grants are deployed.

How benefit will be delivered: The HEAR program will deliver opportunities for a trained workforce across the state. Successful deployment of HEAR will increase demand for energy

efficient and clean energy technologies, expanding an existing construction workforce while providing new opportunities to build skills in new technologies to differentiate contractors in the market.

Distinct from the workforce goals mentioned above, the State will work to identify at least three CBOs in Justice40 DACs to partner with to connect unemployed and underemployed jobseekers with entry points into clean energy careers. Entry points could be defined as creating a cohort of jobseekers to meet minimum count requirements for existing employer workforce training programs, connections to apprenticeship programs identified through IRA Home Energy Rebates engagement with labor groups, or connections to technical college training programs. While the funding for this work is not yet certain, opportunities for grant funding to support projects can be explored.

When benefit will be delivered: Throughout the implementation of the HEAR program, but specifically, benefits will accrue and are anticipated to be measurable after five years of program implementation.

Milestones toward benefit delivery: Engage three CBOs located in DACs to scope opportunities to create and in the future fund clean energy career pipelines.

Metrics to track and report on benefits:

- Net-increase in clean energy jobs in the energy efficiency sector, as reported by the [Clean Jobs Midwest Report for Wisconsin](#).
- Enrollment numbers in labor union apprenticeship programs and in technical college energy efficiency career path courses.
- Enrollment numbers in BPI energy auditor certification program in Wisconsin.

Community-based organization(s) involved in identifying or negotiating benefit or developing plan for benefit delivery:

- Wisconsin Latino Academy of Workforce Development
- The Wisconsin Black Chamber of Commerce
- Silver Springs Neighborhood & Milwaukee Area Technical College

Attachment 8

Consumer Protection Plan

State of Wisconsin Home Energy Rebates Home Electrification and Appliance Rebate (HEAR) Program

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Purpose

The Consumer Protection Plan (CPP) for Wisconsin’s HEAR Program describes the quality assurance features and procedures Wisconsin will perform to protect consumers and ensure customer satisfaction. This CPP will be available on a dedicated IRA – HER program webpage within the Focus on Energy website for all program participants. The CPP will be reviewed at least every two (2) years, with changes clearly communicated to program partners, participants, and the DOE.

Consumer Feedback

Processing Consumer Feedback

Wisconsin’s IRA Home Energy Rebates Program values receiving feedback from program participants and partners. Interested parties will be able to contact the program through the existing Focus on Energy toll free number (800) 762-7077 and via email (IRAHer@focusonenergy.com). All program contact information will be made public on the program’s web pages at: focusonenergy.com/home-energy-rebates.

When feedback is received through the program email address or toll-free number, Focus on Energy will evaluate the information and report the feedback and required next steps to the appropriate party within 2 business days. All contractor complaints, negative feedback or compliments will be recorded by the party who received the complaint in the database of record upon receipt

Survey

Within 2 weeks of the completion of a project, customers will receive a consumer satisfaction survey via email, if an email was provided during the application process. This survey will ensure that the initial customer experience was satisfactory and will alert program staff to any program design concerns or complaints. This survey has not yet been designed.

A follow-on survey will be sent to the customer 3 months after the completion of a project. This survey will allow customers to file complaints, concerns, and issues directly to the program. The survey will also contain procedures for addressing negative feedback, including how the programs will communicate the feedback to affected contractors, distributors, or retailers. The survey will include the questions listed in the table below and may also include other questions. This survey has not yet been designed.

Question	Scale
It was easy to understand the rebate requirements and provide the needed information	Scale: Strongly Disagree = 1, Strongly Agree = 5, (include "Don't Know" and "Not Applicable")
It was easy to find a contractor/retailer	
The contractor/retailer provided a high-quality of service	
The rebate was a major reason for my purchase	
My new efficiency upgrades perform well	
My home is more comfortable than it was before the new efficiency upgrades	
My energy bills are lower since the new efficiency upgrades	
Overall, I am satisfied with my experience with the [Rebate name] program	
I would recommend this program to a friend or family member who could use it	
I plan to do more to save energy in my home because of my experience with this program	

Resolution Procedures

Consumer Complaints Resolution

Definitions

Throughout this CPP, the term Program Administrator and Program Implementer are used. The definition for these terms is as follows:

Program Administrator: An entity hired by the State of Wisconsin to administer the program delivery of the IRA Home Energy Rebate Programs.

Program Implementer: An entity hired by the Program Administrator as a sub-contractor delivering one or more programmatic functions of the IRA Home Energy Rebate Programs.

Registered Contractor: A licensed contractor in the State of Wisconsin who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to customers.

Registered Distributor: A distributor of qualified products who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to contractors or customers.

Registered Retailer: A retailer of qualified products who has agreed to the terms required to deliver the IRA Home Energy Rebate programs to contractors or customers.

A complaint or incident is defined as any event in which:

- Customer contacts the program and alerts them of an issue via email or phone which occurred during or as a result of their participation in the program; or
- An event which deviates from the ideal course of events for customer participation in the program and which could negatively impact the customer's experience.

Notification of Complaints/Incidents

If program personnel (eg. customer service, rebate fulfillment, or field staff) receive a complaint from a consumer regarding a contractor conduct or performance, or are involved in an incident, they are instructed to notify the appropriate Program Implementer as soon as possible.

Upon learning of a complaint or incident, the Program Implementer's senior program manager will designate and assign the complaint or incident to the appropriate staff member. The designee will attempt to contact the individual by telephone within one business day. The designee's goal is to understand the complaint and help resolve the issue as soon as possible. The Program Implementer will respond to safety-related or emergency situations immediately. If a complaint cannot be resolved via the phone, the Program Implementer will schedule a follow-up site visit to further evaluate the circumstances of the complaint.

The Program Implementer will notify the Program Administrator of any complaint that is not resolved within two business days after the Program Implementer receives the complaint, along with a purposed course of action or follow-up plan.

All complaints will be reported to Program Administrator should include the following:

- Customer/Registered Contractor Name
- Address
- Utility Name(s) and Account Number(s)
- Phone Number
- Email Address
- Description of Complaint
- Steps taken to resolve the complaint, including all Program Implementer contacts with the Customer or Registered Contractor
- Results and outcomes of the action taken
- Date of resolution

Complaints will be logged in the contractor or account in the database of record following the Conflict/Incident Documentation Procedures below.

Consumers may also lodge a complaint directly with their Registered Contractor. The contractor will have agreed to the program's "Participation Agreement" which will require their adherence to a standard reporting protocol for complaint and incident resolution. Registered Contractors should endeavor to resolve all complaints/incidents with the customer. If they cannot reach an agreement with the customer, the Program Implementer and/or Program Administrator will become involved, as appropriate.

The Program will publish a remediation process on the program website to describe what actions could be taken when deficiencies or unfair business practices are detected through the inspection process, these results are communicated to the responsible party and any remedial or punitive actions taken follow a pre-defined set of protocols. The remedies and penalties will be developed upon issuance of guidance from the DOE. In the event where financial compensation is requested by the customer, the Program Implementer will work with the Registered Contractor to determine if such compensation is warranted. If it is, the Registered Contractor should offer to pay a reasonable fee for repair and/or replacement of the improperly installed or damaged goods. To determine the amount of the fee the Registered Contractor may propose an amount, ask the customer for an amount or ask the customer to submit an estimate for the work. Ultimately, the Program Implementer, Registered Contractor and the customer must agree to the amount of reimbursement.

Conflict/Incident Documentation Procedures

All incidents and complaints, including health and safety complaints, will be recorded on the contractor or program partner's account in the database of record. The initial entry will include:

- The date of initial complaint/incident
- Customer name and account number in database of record
- Program
- Form of complaint (in person, letter, email, phone call, help desk)
- A detailed description of the complaint/incident
- Action taken
- Results of the action taken
- Date of resolution

The Implementer will document all communications between parties in the database of record.

Periodic review

Documented conflicts and incidents involving Registered Contractors will be reviewed at minimum once per quarter. Findings will be delivered to the Program Implementer by the Administrator. The Implementer will be required to review the Administrator's findings and provide a recommended course of action. Once approved, the Program Implementer will meet with the Registered Contractor to implement the action.

During quarterly reviews all documented conflicts logged in the database of record will be reviewed to determine trends and systemic issues. Registered Contractors who are found to have 2 or more complaints in a rolling 12-month period may face disciplinary action from the program, or may be asked to take corrective actions to ensure complaints do not persist. Disciplinary action may include but is not limited to: the program may issue a warning to the Registered Contractor per the program's "Participation Agreement" the program may require the Registered Contractor to agree to additional field inspections (QC) for a prescribed period time, provide additional data when submitting application, or they may be delisted.

The Program will reserve the right to determine if corrective or disciplinary action is warranted based on the circumstances of individual complaints and the documented outcome.

Quality Control (QC) Inspections

The Program Implementer will be required to maintain records generated from QC inspections for a period of six years. Data points that must be retained include:

- Sampling rates (overall)
- Findings (per QC)
- Corrective actions taken if any
- Verification of conformance to program requirements (per QC)

Arbitration and Holder in Due Course Rule

No contracts may include a mandatory arbitration clause. Registered Contractors and program partners may not require mandatory arbitration for any issues or incidents that arise in connection with IRA Home Energy Rebate work.

Per the Holder in Due Course Rule consumers have the right to assert the same legal claims and defenses against anyone who purchases the credit contract, as they would have against the seller who originally provided the credit.

Data review

Each rebate application will go through an approval workflow prior to payment. The approval workflow will be composed of reviewers from the entities delivering the programs, including Program Implementers and Administrator staff.

The application approval workflow reviewers will consist of experienced staff trained on the program participation and eligibility requirements, measure eligibility and requirements, and proper documentation and data needs. Reviewers will have an understanding of residential energy efficiency technologies and practices. Trainings will focus on HEAR program policies and procedures, application review standards, training on the IT systems they will work with, and data review procedures. Checklists with all required data points and review criteria, guides, and tools will be provided to aid in the approval process.

Data collected will be maintained for 6 years from the project completion date.

Program Implementers will review and confirm, at a minimum, the following information for accuracy:

- Dwelling type of project. Project scope and equipment is eligible for the dwelling type.
- Installed equipment is on a Qualified Product List (QPL).
- Collection of the following data points and accurate entry in reporting and tracking system:
 - Unique home identifier (address).
 - Dwelling type.
 - Existing energy equipment/systems to be replaced, if any.
 - New energy equipment/systems proposed for installation.

- Estimated total project cost. The total cost of all upgrades within a completed project invoice inclusive of any rebated amount.
- All other datapoints listed as required in the Data & Tools Requirement Guide
- Review of proposal and/or contract and invoice.
 - Scope of work is the same.
 - Same installation address on documentation, matches any reservation or rebate coupons issued for project.
- Written acknowledgement from the consumer of the amount owed that is not covered by the rebates.
- Scope of work meets program requirements.
- Rebate amount aligns with verified income category.
- Each rebate does not exceed equipment cost.
- Rebate does not exceed relevant measure and program maximums.
- For projects not involving the installation of a heat pump for space heating/cooling:
 - Geolocated photos of the existing that is being replaced.
 - Certification that the equipment proposed in the scope of work did not already exist in the home (if not fuel switching).
 - Gross project cost estimate
 - List of upgrades in the qualified electrification project for which the rebate was provided
- Only for projects involving the installation of a heat pump for space heating/cooling:
 - DOE approved auditing tools and modeling software were used for the project and are on the list of the installing Registered Contractor's approved tools. A copy of all reports provided to the customer are required as part of the application documentation, if available.
 - Copy of the home assessment report. A checklist with the home assessment requirements will be created and shared with application reviews. The checklist will cover:
 - Recommendation of properly sized unit by a qualified HVAC contractor
 - Onsite visual inspection of the existing conditions of HVAC system, duct sealing, and envelope.
 - Estimate of utility bill impacts, along with written acknowledgement by the consumer, under the following situations:
 - if upgrade includes fuel switching.

- if the upgrade falls within one of the State’s pre-defined set of home pre-conditions and/or the scope of work scenarios that will constitute unacceptable risk of raising utility bills. This includes but is not limited to the following:
 - Uninsulated home converting from natural gas to electric heating system.
 - Installation of equipment that is improperly sized for the home.
 - home within a region where electric rates are significantly higher than gas rates.

In addition to spot checking the information reviewed by the Implementer, the following items will be included as part of the Administrator’s review and approval:

- Verification that the following application documents are uploaded and accurate:
 - Post-installation photos of major upgrades for each application. Reviewers will follow provided guidance to confirm the integrity and validity of the photos. Guidance may include auditing a sample of the photos, using AI to prove photo is unique to the specific project and address, or analyzing meta data, as identified by upcoming guidance from DOE.
 - Proof of combustion safety testing on fossil fuel equipment in homes where fossil fuel systems were impacted by the installation of new equipment.
 - Proof of commissioning testing on HVAC equipment in all homes where new HVAC systems were installed as part of the project.
- Installation details, including site address and customer name, match the information listed on the rebate coupon.

Quality Control (QC) Inspections

The Implementer will be required to maintain records generated from QC inspections for a period of six years. Data points that must be retained include:

- Sampling rates (overall)
- Findings (per QC)
- Corrective actions taken if any
- Verification of conformance to program requirements (per QC)

Onsite Inspections

The first five (5) projects of each Registered Contractor will undergo a post-installation inspection. Registered Contractors that are current Focus on Energy Trade Allies already receiving post-installation QC visits will be exempt from this first five requirement. If issues are identified with the first five projects, an inspection will be required of the contractor's projects on a continuous basis until either five consecutive inspections are completed with no issues, or the Implementer has determined that ongoing issues with the installation have been resolved.

Upon the successful completion of the five post-installation inspections, a minimum of five percent (5%) of each contractor's projects will be inspected. A higher percentage of projects may be inspected if issues are identified during an inspection. Projects selected for inspection will be tracked within the program's tracking and reporting system and Excel spreadsheet, if needed. Inspection details to be tracked include date of inspection, results, and corrective actions, if required.

Projects from the Home Efficiency Rebate (HOMES) program and HEAR program will be included in the project count for the first five and ongoing 5% requirements for Registered Contractors.

Inspectors will be part of the core implementation contractor's team, trained on all aspects of the program requirements. The inspectors will be certified by the Building Performance Institute (BPI) with a minimum certification of Building Analyst Technician (BA-T). TREC funding will not be used for the training of inspectors.

Inspection protocols will be documented and provided to all inspectors. Acceptable tools and/or templates for capturing data and photos will be identified and inspectors will receive training on proper use of them. Copies of the inspection reports will be uploaded to the tracking and reporting system. The inspection protocol will include:

- Visual inspection of the site and work conditions.
- Review of the scope of work/contract and invoice to verify that the installed measures match the contracted scope of work.
- Valid customer signature on the contract. E-Sign compliance for electronic contracts.
- Timestamped and geolocated photos of the installed equipment. If timestamped photos and geolocated photos are not available, an exterior photo of the building showing the house number/address is will be required, in addition to the photos of the installation and equipment. Required photos will vary based on project type..
- Verification of the diagnostic tests, if applicable. This may be completed either by observing the Registered Contractor's testing or inspector testing.

Registered Distributors, Retailers and Contractors

Distributor and Retailer Registration and Listing

To be listed on the Registered Distributor and Retailer list, a business must first sign a Memorandum of Understanding (MOU) with the Program which will outline the expectations and requirements of the distributor to participate in the Program. Once the MOU is signed, the distributor will be required to complete the registration application to be listed on the Registered Distributor list.

As part of agreeing to participate in the IRA HEAR program, distributors and retailers must at minimum agree to the following to be listed:

- Registered Distributors and Retailers must make available for sale eligible appliances for a qualified electrification project.
- Registered Distributors and Retailers must have systems capable of providing rebates for qualifying equipment rebates.
- Registered Distributors and Retailers must agree to submit rebate requests to the Program Implementer in a timely fashion.

Registration applications will be reviewed within 2 business days of receipt. Registration acceptance is subject to approval by the Program. An application may be returned to the applicant if it is missing any information or if the Program requires clarification. Registered Distributors or Retailers may be delisted from the program for failing to adhere to program requirements including those set forth in the Registered Distributor and Retailer MOU and Participation Agreement.

Once an application is approved the Registered Distributor or Retailer will be included as a Registered Distributor and Retailer list located on the Program's website. Because Focus on Energy already uses a tool to direct customers to Focus on Energy Trade Allies the HER Programs Find a Qualified Registered Contractor Tool will be a familiar part of the process. The program will further inform potential customers of the tool and project processes through our outreach efforts including but not limited to: print and digital collateral, direct contact, and detailed instructions directly on the tool's webpage.

Equipment sold by distributors who are not registered are not eligible to receive HEAR rebates. Furthermore, technologies that require contractor installation must be installed by a Registered Contractor.

The following technologies must be installed by a Registered Contractor or program partner on the qualified contractor list:

- Electric heat pump for space heating and cooling.
- Electrical wiring.
- Electrical load service center.

Contractor Registration and Listing

Businesses who wish to offer HER rebates to their customers must be listed on the Registered Contractors list. To be eligible for listing, the contractor must hold current general liability or equivalent insurance, active home performance industry credentials relevant to the services being provided (eg. BPI certification), a state license, or must register with the state (when applicable). The program will review all documentation and confirm accuracy using publicly available tools and databases when possible. For example, BPI certification can be confirmed by performing a search using the [BPI 'Find a Contractor' tool](#) available on the BPI website; state license numbers can be confirmed using the [Wisconsin Credential/License Search](#) available on the Wisconsin Department of Safety and Professional Services website. The state will continuously evaluate methods of verifying credentials and implement those methods when identified.

The program will develop and publish a Registered Contractor application. The application will be used to collect data and supporting documents from contractors who would like to offer IRA Home Energy

Rebates to their customers. Parties interested in being listed on the Registered Contractors list will be required to complete the registration form, agree to the Participation Agreement, and submit all required documentation as specified on the application.

Specific credentials will be determined prior to the Registered Contractors registration application going live. The application will detail all acceptable credentials and documents that will be required for different trade groups. The program will also provide registration details including a link to the Application and Participation Agreement, and a list of all required credentials and documentation, to the current Focus on Energy Trade Ally network via email prior to program launch.

Documentation must include:

- Proof of business insurance.
- Proof of state license, if applicable.
- Proof the business is registered with the State of Wisconsin.
- Proof of successful completion of approved training, when applicable.
- W9.
- Certificate of insurance showing current general liability or equivalent coverage.

Implementer will review registration applications within 2 business days of receipt. During application review the program will verify documentation as described above, confirm all required fields have been completed, confirm the applicant is either not registered or is a current Focus on Energy Trade Ally in good standing, and confirm that the business does not appear on the Department of Treasury's [Do Not Pay list](#). An application may be returned or rejected if it is missing any information or if the Program requires clarification on any fields.

Once an application is approved the Registered Contractor will be listed on the IRA Home Energy Rebates Find a Registered Contractor Tool located on the Program's website.

Focus on Energy does not currently require a W9, state license, or insurance documentation to be on file for all Trade Allies. Additionally, not all Focus on Energy Trade Allies will wish to offer IRA Home Energy Rebates to their customers. Therefore, to ensure the integrity of the list and contractor network, all businesses who wish to offer IRA Home Energy Rebates will be required to complete the registration application. This includes current and former Focus on Energy Trade Allies and distributors.

Projects completed by contractors who are not registered are not eligible to receive HEAR Rebates.

Registered Contractors may choose to withdraw from the IRA Home Energy Rebates Program at any time by notifying the program in writing. Implementer must notify the Program Administrator of a Registered Contractor's withdrawal request and update the business' account in the database of record within 1 business day. Once the Program Administrator receives notification the Administrator will update the Registered Contractor's account in the database of record to reflect that they are no longer offering IRA Home Energy Rebate programs. The Registered Contractor will subsequently be removed from the list (delisted). Removal from the list in these circumstances will take no longer than 3 business days. All documentation provided by the former Registered Contractor will remain in the database of record.

Contractors Trained Under IRA Section 50123

The Wisconsin Training for Residential Contractors (TREC) program, as established through IRA Section 50123, anticipates a program design with DOE approved training and certifications for the following job sectors: Energy Auditors, HVAC Contractors, Plumbers, Electricians, and Home Performance Contractors. These trainings and certifications will meet DOE requirements established in IRA Section 50123, with the intent that these trained workers will assist in implementation of IRA Home Energy Rebate program projects across the state. The Wisconsin TREC program will recruit new and current contractors into training and certification programs. Contractors who successfully complete a training or certification program as part of IRA Section 50123 funding will become eligible to be listed on the Qualified contractor list upon completion, however, the contractor will still need to register their business and agree to the Registered Contractor Code of Conduct.

Delisting

Registered Contractors, Distributors and Retailers can be removed from the Registered lists for:

- Failing to adhere to Program requirements (ie. Failing to adhere to the Participation Agreement).
- Failing to adhere to the conflict resolution process.
- Receiving multiple customer complaints for the same issue and failing to take corrective action once the issue is identified.
- Any other reason the Program deems necessary.

Ramifications for non-compliance with areas above: The full procedure will be in the Participation Agreement.

- First confirmed offense – written warning, notice to cure.
- Second confirmed offense – indefinite suspension from all IRA Home Energy Rebate programs and removal from Registered Contractor list.

Tools and resources

Prior to launch, the Program will publish a list of approved tools (eg. modeling tools, home assessment tools or software) and job aids on the Program website. The Program will adhere to requirements according to statute.

Post registration, the Registered Contractor or program partner will be contacted by the program to explain allowable tools relevant to the Registered Contractor's or program partner's services offered and provide information on training available.

Installation

The State of Wisconsin will provide guidance and direction to installing Registered Contractors for completion of quality installations that meet industry standards, including ensuring they comply with local and state laws, permits, and codes. The State will follow standards developed and vetted by industry experts, including ENERGY STAR®, Air Conditioning Contractors of America (ACCA), and National Renewable Energy Laboratory (NREL). The guidance will address correct design, proper installation, and final testing of the equipment per project type. The guidance will be available on the HER programs webpage prior to program launch.

The State of Wisconsin will include language within the Registered Contractor registration application stating the contractor must comply with all applicable laws, ordinances, regulations, and codes regarding the installation of the equipment.

Registered Contractors must ensure that sales language and contract language are the same.

The scope of work provided to the customer will be a detailed listing of the home improvement measures. The scope of work will specify equipment recommendations and include the installation requirements and conditions.

Installation of the measures will be completed in an order that prevents potential ensuing defects and maximizes energy savings. Equipment and materials must be installed according to the manufacturers' installation instructions. Materials and installation methods will be consistent with a building science-based approach to maximize savings, minimize indoor air quality problems, minimize moisture accumulation, and ensure maximum operating capacities of the installed equipment.

Contractors will complete a quality assurance (QA) review of each project. Depending on the scope of work, the QA requirements may include a visual inspection, commissioning of the system, diagnostic testing, and combustion safety testing. The contractor will provide the QA documentation as part of the applications materials, including photos of the installed equipment and materials.

Projects involving HVAC upgrades

Projects involving HVAC equipment assume that HVAC equipment and components are in new, factory clean condition. Contractors will conduct a home assessment that ensures that the HVAC design will include ventilation and heat gain/loss load calculations, proper equipment sizing, and that indoor and outdoor equipment components are properly matched. During the installation, all applicable testing shall be completed, which may include airflow, electrical requirements, combustion venting, and proper functioning of system controls. The contractor will provide system documentation and educational support to the customer. This may include owner's manuals, warranty and service agreement information, maintenance plans, and recommended system settings.

Financing Considerations

If financing for the energy efficiency upgrade is provided to the property owner by the Registered Contractor, a written disclosure listing the number of payments, monthly payment amount, late fees, and other important payment terms is required. The Registered Contractor must ensure an ability to repay determination that does not include projected savings from an energy report because expected savings may not materialize due to household and market developments.

This disclosure must be provided to the customer in advance of contract signing, with a 7-day waiting period between disclosure and contract signing. The waiting period should only be removed in an emergency, in which the property owner, in their own handwriting, explains the emergency and the need for emergency work, and states they understand they are waiving the waiting period. In non-emergency situations, there should be at least a three (3) day window after the contract is signed and before work begins, in which the property owner has the right to cancel the contract.

Continuous Improvement

Preventing Waste, Fraud, and Abuse

The state is committed to preventing all instances of waste, fraud, and abuse. To prevent these issues from occurring Program staff will review all rebate applications to ensure they meet acceptable standards. As such, the State will take the following steps to identify, mitigate, and reduce fraud, waste, or abuse, as well as unfair business practices.

The state will require desk review Quality Control (QC) at all stages of payment approval to check for fraud, data integrity, and accuracy. At minimum the reviewer will check for duplicate submissions, duplicate addresses, all required documentation is present and complete, that the installing contractor is on the Registered Contractors list, and payments are being made to the correct entity. The state will create a desk review QC guide outlining QC best practices and review requirements. The best practice guide will be reviewed on a biannual basis to ensure the requirements are relevant to the current state of the program.

The state will identify opportunities to verify the legitimacy of contractors before adding them to the Registered Contractor list. The registration review will include checking the U.S. Department of Treasury Do Not Pay system to confirm the contractor is not listed. Appropriate business registries will be consulted to confirm the validity of the business and its address. The state will identify relevant state databases that could be utilized to verify the existence of the business and formal complaints against the business that involve fraud.

Households that use self-attestation as their method of income verification will consent to grant access to the Program to review the household's tax records to ensure income eligibility requirements were properly followed. Self-attestation will only be allowed in situations in which the household experiences an emergency and needs immediate replacement of HVAC equipment.

The Public Service Commission also has established processes to refer items to different state agencies depending on the issue. For payment default issues, the Commission can refer items to the Wisconsin Department of Justice (DOJ) and in the past has worked with the Wisconsin Department of Revenue (DOR) when an individual or entity has defaulted on a loan and entered into a collection's agreement. For consumer protections issues, such as business misrepresentation or fraud, the Commission can refer these matters to the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP). Consumers can also file a complaint directly with DATCP. The Commission also has an internal complaint process under Wis. Admin. Code chs. PSC 113 and 134 for consumers to file complaints and request a formal review process.

Protecting against artificial cost inflation

To ensure Registered Contractor costs are not artificially inflated, each quarter the state will randomly sample 25% of invoices submitted to compare costs. To establish an average cost the State will review costs of invoices submitted to the IRA Home Energy Rebate programs, historical Focus on Energy costs when applicable, and average costs provided by relevant state agencies.

If some Registered Contractors' costs are consistently higher than others within the same geographical regions of the state, the Implementer will be required to issue a written warning to the Registered Contractor and require them to substantiate their costs within 30 calendar days of receipt.

The Implementer will review the Registered Contractor's response and either accept the Registered Contractor's reasoning or provide a recommended course of action to the Registered Contractor within 14 business days. The recommended course of action will be determined by the Implementer. The course of action can include, but is not limited to, a requirement to provide justification for higher-than-average costs for an appropriate length of time to be determined by the Implementer or having more than 5% of the contractor's projects reviewed for a period of time determined by the Implementer. If the Registered Contractor fails to adhere to the terms of the course of action, the Implementer and the State may take action to remove the Registered Contractor from the Registered Contractor list.

During the review period the Registered Contractor may still perform work for the Program. All the Registered Contractor's applications will be subject to a desk review during the review period. Costs will be closely monitored and noted during this period.

All communications will be documented on the Registered Contractor's account in the database of record.

Registered Contractor can appeal the Implementers recommended course of action. In the event of an appeal the Implementer will review the case with the Administrator. The State may either uphold or amend the Implementer's recommended course of action.

Assessment Data Review

All assessment data will be reviewed by Program staff to ensure all required information is present. Upon discovering a discrepancy or missing information Program staff will request a correction from the assessor.

Automation

The state will develop a plan to review all functions that can be automated and analyze steps needed to incorporate efficiencies within the program procedures and systems.

Evaluating QA Systems

The state will continuously evaluate the efficiency of all QA systems and processes. The state will make updates when process improvements are discovered and tested.

Budget and Financial Evaluation (Roles and responsibilities)

Budget details will be provided as part of the final DOE application submission.

Attachment 9

Education and Outreach Plan

State of Wisconsin Home Energy Rebates Home Electrification and Appliance Rebates (HEAR) Program

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Introduction

The foundation for a positive consumer experience lies in effective outreach and education regarding the benefits of the IRA Home Energy Rebate programs. Focus on Energy was chosen to administer the Wisconsin program because of the structure already in place to reach most of Wisconsin’s residential customers. Focus has a successful communication platform already in place, i.e. website, newsletters, support channels, etc. Focus is also able to start with an engaged group of contractors, partners, and potential participants and will be able to share information on rebates that can be stacked on top of the Home Energy Rebates for participants. This may include additional rebates or services through the Department of Administration’s Division of Energy, Housing and Community Resources (DEHCR) Home Energy Plus program, Focus on Energy, tax credits and other utility incentive programs.

Focus on Energy will utilize outreach efforts to cross promote both the Home Efficiency Rebates (HER) and Home Electrification and Appliance Rebates (HEAR) programs as much as possible and where appropriate, depending on the communication tactic and message.

The state will launch specific contractor-installed measures first, with plans to include a retail program afterward.

Contractor Outreach

Contractor participation and understanding of the HEAR program is critical for success. During the first 12-18 months after program launch there will be a heavy focus on engaging contractors and retailers. The State of Wisconsin (The State) does not believe recruitment efforts will need to be a large focus of initial outreach efforts. It will be important to be clear on what contractor expectations are if they are to deliver the program to participants. Naturally, outreach will begin with the existing Focus on Energy Trade Ally network. Any registered contractor for the IRA program will need to sign up to participate in the Home Efficiency Rebates program, regardless if they are already a Focus on Energy Trade Ally. Contractors will have to agree to meet all Focus on Energy Trade Ally qualifications, agree to the IRA Code of Conduct, and provide any additional documentation the program requires for participation. Approval is estimated to take approximately two business days. Once participation is confirmed, the bulk of communications and interactions with contractors will be related to how to work through the steps of the program, making these steps easy for them to understand, and how to talk about the program to participants. Contractors can always reach program staff through a dedicated IRA email address, Focus on Energy phone number, or sign up through online application (currently part of the Focus on Energy Trade Ally website).

The following is a list of anticipated tactics that will be part of program outreach deliverables.

- Email – one way to reach contractors/retailers with program information is via email. Email will be a primary way to target participating contractors and share program updates, tips, information, success stories, etc. with them.
- Direct outreach – while it is nice to have documentation of information, sometimes the best interaction is an actual conversation. Focus on Energy has the benefit of an implementer dedicated to program Trade Allies. Focus implementers have Energy Advisors who are the primary point of contact for contractors. It is the intent of the program to use them to engage and have regular contact with registered contractors as well. This outreach may be either through in-person visits, phone calls, and email.
- Website Resources – Currently, Focus on Energy has a Trade Ally section on their website. This will be utilized as a central location of resources for IRA registered contractors as well. Not only will program details be available, but helpful speaking points or suggestions on explaining program or technology details to participants. Registered contractors can use the Focus on Energy logo to promote the program and co-branding ads may be available for use.
 - All IRA registered contractors will be listed on the program website so potential participants are able to see who they can work with to deliver program benefits.
- Video – there are many opportunities to use short videos to provide directions to contractors/retailers that will make their program participation easier. Focus on Energy calls these “explainer” videos, and many find them helpful in ways we use them today. From walking contractors through income eligibility, forms/documentation, or a new payment submission/look up tool, a short video may be more helpful or used to compliment to written directions. These videos can be found on the dedicated Trade Ally webpages noted earlier and featured in regular email communications.
- Collateral – While a vast amount of printed collateral is not believed to be needed, sometimes a piece of paper to walk a program participant through the program steps, qualification, and benefits is needed. This would be a flyer or program fact sheet explaining the program and their

participation. It might also be something distributors use to go over the program with their contractors.

- Social media – In the event that additional IRA registered contractors will need to be recruited, The State of Wisconsin can utilize existing email lists and cross reference them with LinkedIn or Facebook outlets and run targeted ads.
- Annual events – Each year, Focus on Energy or participating utilities host in-person, Trade Ally meetings where new program information is shared, feedback is gathered, and networking can occur. Updated IRA program info can also be shared at these meetings to either highlight benefits of participation or communicate any changes, or additional offerings available.
- Partnerships
 - Distributors – Focus on Energy currently has relationships with many distributors in the state through its existing Midstream and Instant Discount Programs. To start, targeted outreach to selected existing Focus on Energy distributors related to delivery of the Home Efficiency Rebates program will be used. These distributors are listed below. Using distributors for their close interaction with contractors may help reach organizations that had not been previously. Interaction may include presenting IRA program information at meetings, through newsletter communications, other touch points already in place. New distributors will be targeted for inclusion in these programs as well, as identified during program planning. Some of those we initially intend to work with, and already having relationships with through Focus on Energy programs, are listed below.
 - Design Air
 - Gustave A. Larson
 - Auer Steel
 - Ferguson East
 - Ferguson West
 - First Supply
 - Temperature Systems, Inc.
 - Mid-State Supply
 - Stevens Equipment Supply
 - Weatherization agencies – Weatherization agencies will be an important partner, as their program and IRA Home Energy Rebate programs both target an income-based audience. In many cases, to have the customer maximize benefits, there will need to be coordination between federal programs benefits. If a Weatherization Contractor is already in a home, they can also install complementary IRA measures. These agencies may also be a resource if they are unable to retrofit all homes in need in particular high-energy burden communities or if homes do not qualify for Weatherization programs, but still need help, can be referred to IRA programs. For this to occur, additional training will also need to be provided.
 - Licensed Entities – Current home programs in Wisconsin already partner with several types of home contractors. One of the benefits of IRA HEAR are additional home improvement measures that we may not have been able to improve before. An example is electrical panel upgrades. The State will be reaching out to the Wisconsin Chapter of the National Electrical Contractors Association (NECA) for partnership. Other associations to engage might include Plumbing, Heating, Cooling Contractors of Wisconsin, IBEW Locals, LIUNA Wisconsin

Laborer's District Council, or BlueGreen Alliance. The State will also be working with Wisconsin's Department of Safety and Professional Services to get participating members of a variety of licensed trade entities. These are also organizations that can be engaged with through sponsorship/advertising opportunities if needed.

Once the early program stage passes, focus may need to change to recruiting IRA HEAR registered contractors, especially in certain areas of the state. Email blasts, social media ads, professional organization marketing, manufacturer presents, and direct outreach are all examples of more formal marketing efforts that may be needed.

Since these tactics focus more on businesses, they may also be relevant avenues to reach multifamily owners. General outreach for multifamily opportunities will be limited. However, many of the education tactics listed above can still be relevant. We believe building owners/managers would benefit most from direct or targeted outreach. In partnership with WHEDA, we will be able to secure a list of targeted multifamily contacts. This list can also include those properties that qualify for Section 8 housing, which will greatly benefit income qualified tenants. Statewide multifamily associations may also be partners to reaching this audience through utilizing their meetings and newsletters.

Current Focus on Energy partners and Trade Allies will be communicated with first through existing outreach channels. They are always able to reach the program through our dedicated IRA email and Focus on Energy phone numbers.

Household Outreach

While contractor participation is essential, no projects would be complete without a program participant. For the launch period and 12-18 months after, the priority will be on making sure to educate the participant on the program process and ensuring they have a positive customer journey. Eligible equipment found at retailer locations would not be available until several months after launch of contractor installed equipment. If participant recruitment is necessary, it may be targeted in certain areas of the state with higher contractor capacity or retailer availability. Since participant income is capped at 150% AMI, efforts to reach households will be targeted. While most of the education and outreach efforts below can be used for all eligible participants, there will be opportunities to target certain demographics. Priority of targeted households will be to single family homeowners in disadvantaged communities, identified through counties, zip codes, or public assistance participant lists, in areas of the state where we know contractor capacity or product availability is known.

The following is a list of anticipated tactics that will be part of our program outreach deliverables.

- Email – Email will be used to share updates with residents about launch, program onboarding, tips, etc. Not only are we collecting emails from those that registered to get more information, Focus on Energy, Wisconsin utilities, etc. there are several partner organizations with regular newsletters that would allow HEAR to have an article.
- Partnerships – Direct outreach is typically not feasible to reach a broad participant audience. We have several cities/municipalities, advocacy groups, and Community-Based organizations clamoring for information. Not only has Focus on Energy and The State of Wisconsin already been invited to speak already before programs launch, it is expected these invites will continue, allowing the program to engage smaller groups to share program information and benefits.

Many of these groups feel HEAR is an important program for their area and will also be doing outreach on The State's behalf. Use of existing newsletters, email lists, public information sessions/events, and helping participants find trusted contractors in their area, and other outreach or education tactics that these groups find their community benefits from. Having like-minded people that are trusted share program information is invaluable.

- Full detail on these Community Based Partnerships can be found in the Community Benefits Plan. However, the program hopes to initially partner with at least 10 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and refer eligible households to participate.
- Program outreach to these groups will vary, but the majority will most likely be one-on-one meetings.
- An example list of some, but not all community stakeholders that Wisconsin will engage are listed below.
 - Wisconsin Local Government Climate Coalition
 - Focus on Energy Partnered Community-Based Organizations
 - Vernon County Energy District
 - DNR Green Tier Legacy Communities
 - Reclaiming Our Neighborhoods (RON) Coalition (Milwaukee)
 - Sheboygan Housing Coalition
 - UMOS (Milwaukee), Centro Hispano (Milwaukee & Dane Counties), Wi EcoLatinos (Dane, Rock, & Columbia Counties), Dane County Latino Academy of Workforce Development
 - Hmong American Partnership (Appleton) and Hmong American Center (Wausau)
 - 16th Street Community Health Center (Milwaukee)
 - Habitat for Humanity (chapters across the state) & Revitalize Milwaukee
 - Walnut Way / Lindsay Heights Neighborhood Improvement District, Sherman Park ECO Neighborhood, Northwest Side Community Development Corporation, and Citizens Action WI
 - Blacks for Political and Social Action
- Website – Currently, the State of Wisconsin is driving everyone to the Focus on Energy IRA Home Energy Rebates Program webpages to get the most up to date information. Centralization of resources is important for ease of updating and it allows people to know they can always go to the site for reliable and current information. As noted in the partnership tactic, not only are many third-party organizations working on The State's behalf, having a place where they can get information, so our message is consistent is very important. Process, technology specific pages, income qualification calculator, rebate stacking of Focus on Energy/IRA, Registered Contractors, blogs, and videos are all things that may be available on the website for participant education. The program phone number and dedicated email address will also be listed on the website for any additional needs or questions.
- Video – there are several opportunities to use short videos to briefly explain a complicated program. Simple pieces of information can be broken down and explained to people that might help them walking them through income eligibility, specific equipment benefits, and technologies they haven't heard of. To some, a short video may be more helpful to hear how it

works than a written document. Videos may be found on program websites, but also highlighted in program emails or social media calling people to the available resource.

- Collateral – While a vast amount of printed collateral is not believed to be needed, there may be some materials used to give more detail on qualifying HEAR energy saving measures and process. Collateral may include program process fact sheets, flyers/cards directing participants to the website for current information, resources, or information on common equipment upgrades. In some instances, there may be opportunities for co-branding opportunities with local municipalities, utilities, or community partners.
- Social media – Being able to share program information/updates on a social platform will be helpful to drive people to videos or other web resources. Based on participant income qualification, targeted ads will be run by zip codes relating to those likely to qualify for program standards. Social platforms that may be utilized are Facebook and Instagram.
- PR/Media – traditional media has been interested and responsive to content related to IRA programs. Based on relationships, The State is hopeful to get re-occurring spots on newscasts, radio sponsorships on Wisconsin Public Radio and Spanish-speaking radio stations in the state. It is unlikely budget will be set aside for traditional paid media advertising and focus would be on earned media or specific sponsorship opportunities that can demonstrate reach to targeted audiences.

Many of the education and outreach tactics listed above will be relevant in multifamily situations as tenants or recipients of owner program participation will need to know how to encourage their owner/manager to participate, explain benefits of upgrades, and how to operate their upgraded equipment or efficiency upgrades.

Current Focus on Energy outreach channels will be a significant help to engaging with a group that is already interested or aware in energy efficiency. Communication through the various channels listed above will also allow sharing information on opportunities to utilize incentive opportunities available through non-federal funds and grants, such as Focus on Energy.

Timeline

The tactics listed above for both contractor and household outreach will be relevant during launch/early program (12-18 months) and the remaining years of the program. This should be approximately summer 2024-2025. Messaging or concentration of efforts might change and initially IRA Registered Contractor focus will be heavier than households to make sure the market is ready, and participants have a smooth customer journey through the program. A proposed timeline of education and outreach is below.

Table 1: Proposed Timeline

	2024	2025				2026			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Contractor Tactics									
Email									
Direct Outreach									
Website Resources									
Video									
Collateral									
Social Media									
Annual Events									
Partnership Outreach									
Household Tactics									
Email									
Partnership Outreach									
Website Resources									
Video									
Collateral									
Social Media									
Media									

Estimated Budget

Budget details will be provided as part of the final DOE application submission.



Attachment 10

STAKEHOLDER OUTREACH ENGAGEMENT SUMMARY

Wisconsin Home Energy Rebate Program

March 2024

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Stakeholder Outreach Summary

Wisconsin Home Energy Rebate Program

Intro

The U.S. Department of Energy (DOE) State & Community Energy Programs (SCEP) Office provided a detailed [Program Requirements & Application Instructions Version 1.1](#) report to guide each state's process of the Inflation Reduction Act (IRA) Home Energy Rebates program design. Information included in this report related to stakeholder engagement outlined the minimum requirements to be included in the Community Benefits Plan:

- Hold at least one public input session to solicit community input on its proposed deployment plans. Ideally, these meetings will take place after this Home Energy Rebates requirements document and ALRD is released by DOE; however, a State may request waiver of this provision upon a demonstration that the public input sessions elicited meaningful input for the State program design.
- Use the input from these engagement sessions to inform the design of its rebate programs, and it must describe how this input was used in its program design.
- Explain how it will solicit and respond to community feedback throughout the duration of its rebate program.
- Describe what community engagement and outreach strategies it will utilize to reach contractor and workforce organizations, disadvantaged communities, low-income households, and other marginalized groups.

The purpose of this Summary Report is to detail the comprehensive efforts Wisconsin has taken, to date, to collect stakeholder and community feedback, inform a program design that works for a variety of stakeholder groups and meets or exceeds these requirements. Program elements of IRA Home Energy Rebate funding for Wisconsin can be customized to incorporate stakeholder feedback. As part of the ongoing program design process, stakeholder input was gathered from around the state through a series of in-person and virtual presentations, an online survey, and direct targeted outreach.

Summary of Stakeholder Outreach Plan

Primary audiences for stakeholder outreach include Residents or Potential Program Participants, Contractors or Trade Allies, and Program Partners or Supporting Entities. Each group provides a key function in the delivery and success of the IRA Home Energy Rebate Programs in Wisconsin by providing unique perspectives informing a program design that works for a variety of Wisconsin stakeholders.

Resident or Potential Program Participant Stakeholders

This stakeholder group consists primarily of residents or landlords that would qualify for IRA Home Energy Rebate Programs through property type, income level, or entities acting on their behalf/best interest. Such entities with close connections to targeted citizen groups include community-based organizations, and local governments. Offering in-person and virtual events, and online surveys was the most effective way to reach this large audience.

Contractor or Trade Ally Stakeholders

This stakeholder group consists of required delivery channel partners and includes contractors, distributors, retailers, and manufacturers. A critical group that will ultimately support and promote program offerings, this group is best reached by direct outreach, in-person and virtual events, and an online survey. Engagement also occurred at the FOCUS ON ENERGY® and Xcel Energy annual Trade Ally Breakfast meetings.

Program Partner or Supporting Entity Stakeholders

This stakeholder group consists of entities closely related to, and perhaps involved to some degree with, actual program implementation. Utilities and State Agencies make up this group with the primary method of engagement being direct outreach.

Promotion of events for end-customers was primarily handled through a series of social media posts. A flyer that included information on all sessions, as well as a customized flyer for each location was provided to third-party organizations/partners that also shared information with their networks. Flyers included session information, ways to participate, and what to expect during sessions. Registration was encouraged to ensure events were staffed appropriately and gather information. Madison and Milwaukee flyers were translated into Spanish. Information was also included in the Focus on Energy email newsletters and Trade Ally Breakfast promotions.

A specific example of this group is ongoing coordination with the City of Milwaukee Environmental Collaboration Office to explore solutions to providing program participants options for energy assessments, which were an identified barrier to program participation, particularly for low-income households that may not be able to afford the upfront cost of an energy assessment.

Reach

Planning for all events and outreach included two important Wisconsin-specific program goals:

- Target customers where up-front costs have been barriers, particularly those with high energy burden or that rely on delivered fuels.
- Transparent program planning and implementation, with opportunities for stakeholder input and public comment.

Local governments were engaged by the Focus on Energy Community Liaison Manager. Local governments provided early feedback on the stakeholder engagement process, recommending that in-person locations be held in Justice40 communities at public and accessible venues, Spanish-translation be provided, when appropriate, and community-based organizations (recommended by local governments) be invited to participate and recruit members of the community to attend. Local government representatives also attended each in-person stakeholder meeting to represent their perspective and to speak on behalf of residents that they hear from that were not able to attend.

Local governments also provided recommendations, and in some cases outreach, to community-based organizations whose work is based in Justice40 disadvantaged communities. This helped promote the survey as well as virtual and in-person events in these census tracts. Some community-based organizations agreed to share the events through their networks; others were able to attend in-person and represent their communities during small group discussions.

In-person events were held in communities that were in or nearby existing Trade Ally breakfasts and were selected to reflect the diversity of the state's rural, urban, and regional population diversity. As mentioned previously, venues and times for in-person events were chosen based on local government recommendations, considerably for locations that parking and public transit are accessible and located in the US government's Justice40 disadvantaged communities. The City of Viroqua was the only site not located in a Justice40 community; however, it is adjacent to a Justice40 census tract. The broader community does reflect a rural perspective with propane as a common heating fuel source.

A disadvantaged community is defined by the methodology outlined in the Climate & Economic Justice Screening Tool ([CEJST](#)). A community is highlighted as disadvantaged on the CEJST map if it is in a census tract that is (1) at or above the threshold for one or more environmental, climate, or other burdens, and (2) at or above the threshold for an associated socioeconomic burden. Maps in this summary show Wisconsin communities that meet these criteria are observed as census tracts in red (Maps 1, 3 and 4). Virtual webinars and the online survey were also provided to reach as many Wisconsin communities as feasible.

The Cities of Madison and Milwaukee flyers were co-branded to provide additional event credibility and to also provide resources for translation. Presentations were translated into Spanish and translators were available at all events in these areas. No requests for translation were made.

It should be noted that while each location for in-person events was carefully considered and selected to be accessible to members of the adjacent Justice40 community, these events were open to the public. Participants were not asked where they lived or what community they represented. The results included in this report, therefore, cannot be drawn on the assumption that the voices heard are representative of Justice40 communities.

The following table represents those that participated in outreach efforts by type of outreach and location/date. 592 participants in total.

Table 1: Participation by Event and Outreach Platform

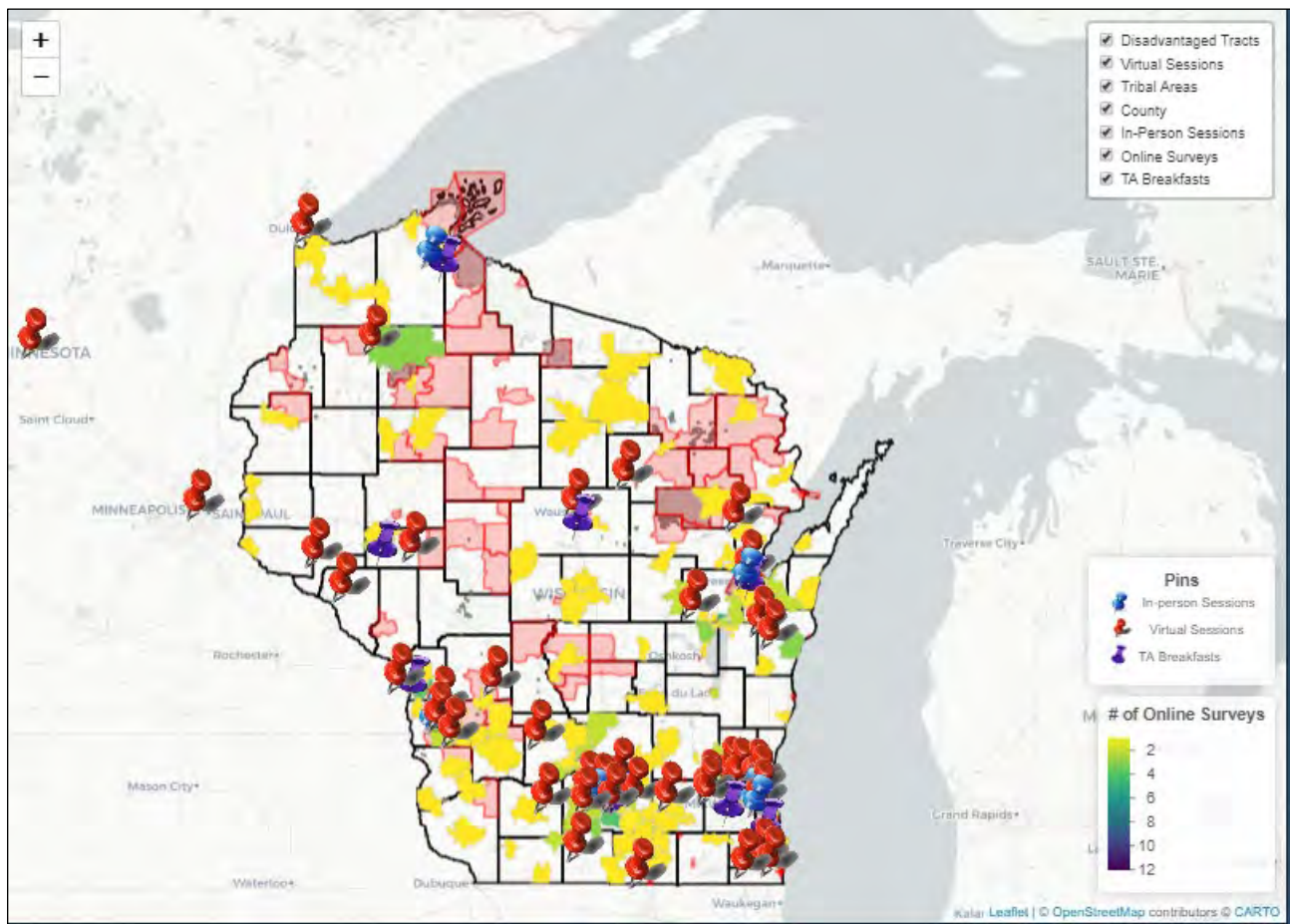
In-Person Session Summary			
City	Date/Time	Location	Attendees
Green Bay	Tuesday, January 23, 2024 1:30-3:30 pm	Brown County Central Library	34
Milwaukee (North)	Thursday, January 25, 2024 6-8 pm	Washington Senior Center	13
Milwaukee (South)	Thursday, January 25, 2024 6-8 pm	Urban Stables	12
Madison	Tuesday, January 30, 2024 6-8 pm	Village on Park	27
Viroqua	Monday, February 12, 2024 6-8 pm	Vernon County Museum	31
Ashland	Tuesday, February 20, 2024 6-8 pm	Blue Wave Inn & The Sandbar	40
		<i>In-person Session Total</i>	<i>157</i>
Virtual Session Summary			
Virtual #1	Thursday, February 8, 2024 6-7:30 pm		81
Virtual #2	Monday, February 26, 2024 6-7:30 pm		101
		Virtual Session Total	182
Online Survey Summary			
Available January 2, 2024 – February 29, 2024			253
		All Total	592

The location of participants that provided feedback is mapped below and compared to an overlay of tribal and disadvantaged community regions. Additional map views of participation can be found in the Appendix.

Map Notes:

- Virtual Attendees were asked to provide their location for mapping purposes. In the first session, 42 of 81 attendees responded. In the second session, 45 of 101 attendees responded. Mid-point zip codes for a given geographic area were used to represent these attendees.
- For both virtual webinars and online surveys, non-Wisconsin engagements were excluded from the maps.

Map 1: Stakeholder Engagement Map - Disadvantaged Census Tracts (Red), Tribal Areas (Grey), Online Survey Response Counts by Zip Code (Yellow-Green-Blue-Purple Scale)



Having a single source of information to share for outreach and program information has been included on a section of the Focus on Energy website. During the active outreach period of January through February 2024; the following represent the results of website impressions. Over 5,400 users interacted visited the main IRA webpage, with over 2,200 on the outreach page.

Chart 1: Dashboard of Views, Users, and Engagement Time of focusonenergy.com/home-energy-rebate

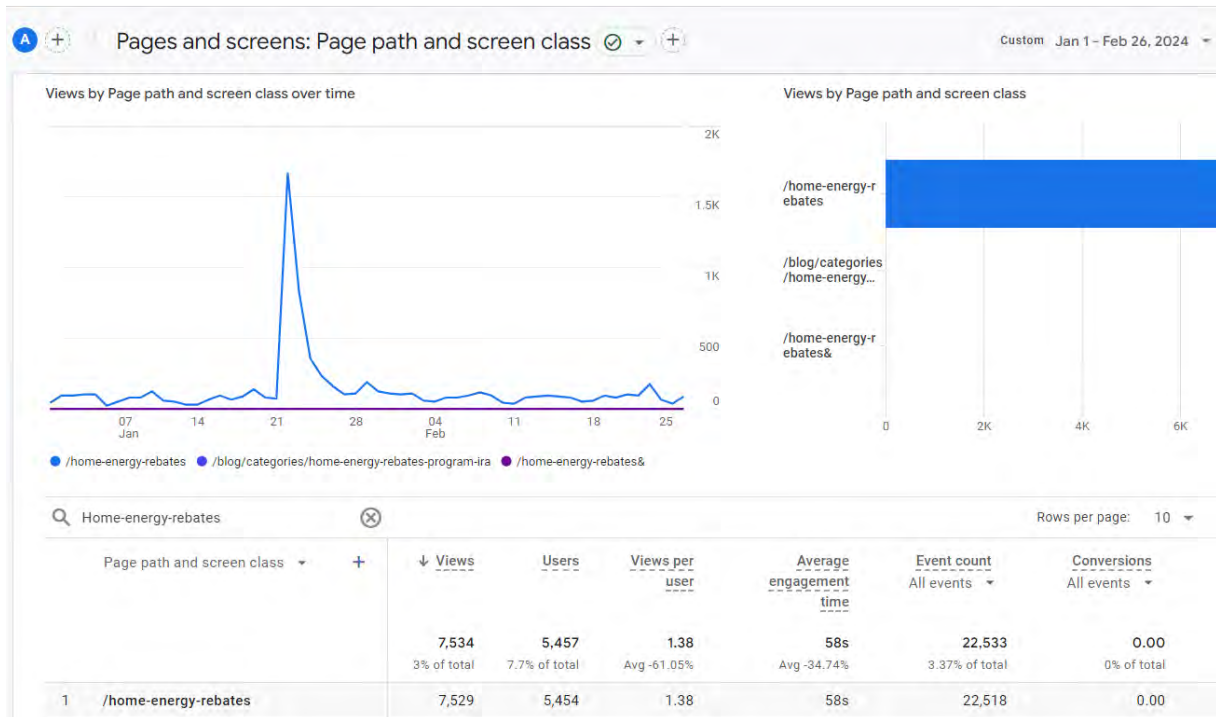
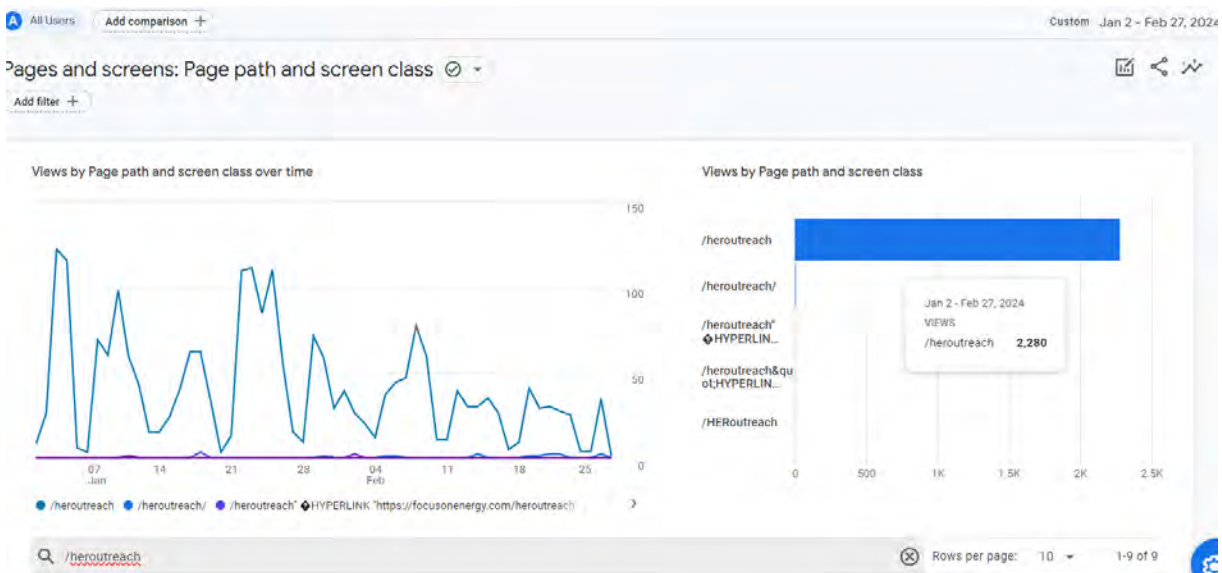


Chart 2: Page Activity and Total Views for focusonenergy.com/heroutreach



Data Reporting

Survey Results

The online survey launched January 2, 2024 and was available through February 29, 2024. While the survey questions were like those asked during in-person and virtual sessions, in-person and virtual attendees received a general presentation of what is known about IRA Home Energy Rebates at this time. This means that in-person and virtual attendees responded to questions with a standardized understanding of the potential programs in Wisconsin, whereas little is known about the level of understanding that virtual respondents had of the programs at the time they participated. Results of questions are shared below.

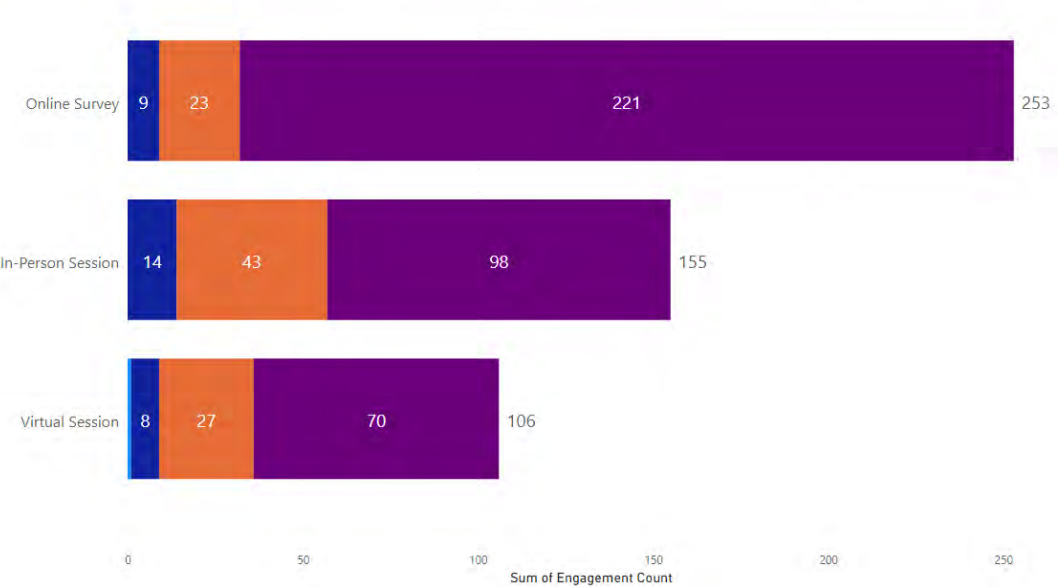
For some question prompts, attendees were given the choice to respond multiple times to indicate preferences, as well as the option to abstain from responding. The result is that not all charts will match final counts, although attendance numbers can be reported with high confidence. The information displayed in the charts below was organized by Engagement Type, and full responses are lower than the overall total attendee count due to incomplete or no responses for a particular question.

Question 1: What best describes you?

Most public respondents identified as residents or potential program participants. The second largest category was utility or program partner, followed by Trade Ally/contractor. As noted, Trade Allies were primarily engaged in separate sessions.

Chart 3
Respondent Count by Engagement Type

● (Blank) ● Contractor or Trade Ally ● Program Partner or Supporting Entity ● Resident or Potential Program Participant

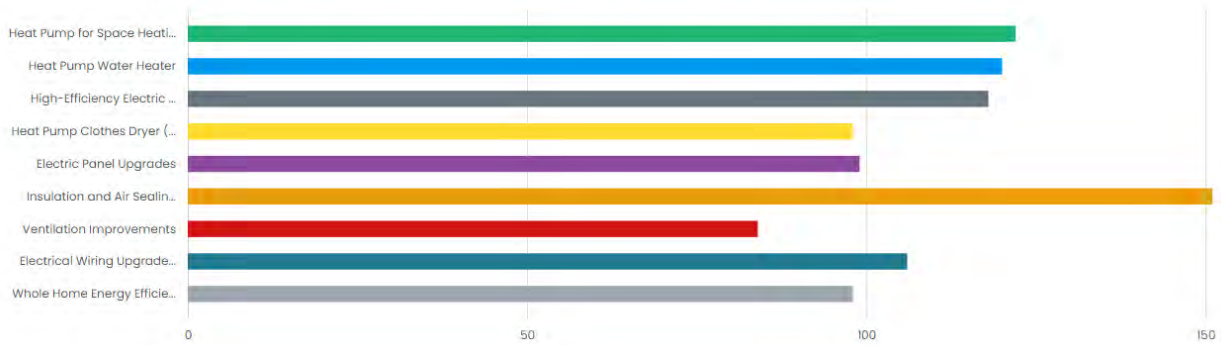


Question 2: Which equipment would you be interested in installing in your home?

Based on online survey feedback, the top three equipment upgrades of interest were (1) Insulation & Air Sealing, (2) Heat Pump for Space Heating & Cooling, (3) Heat Pump Water Heater.

Chart 4: Equipment Upgrade Interest

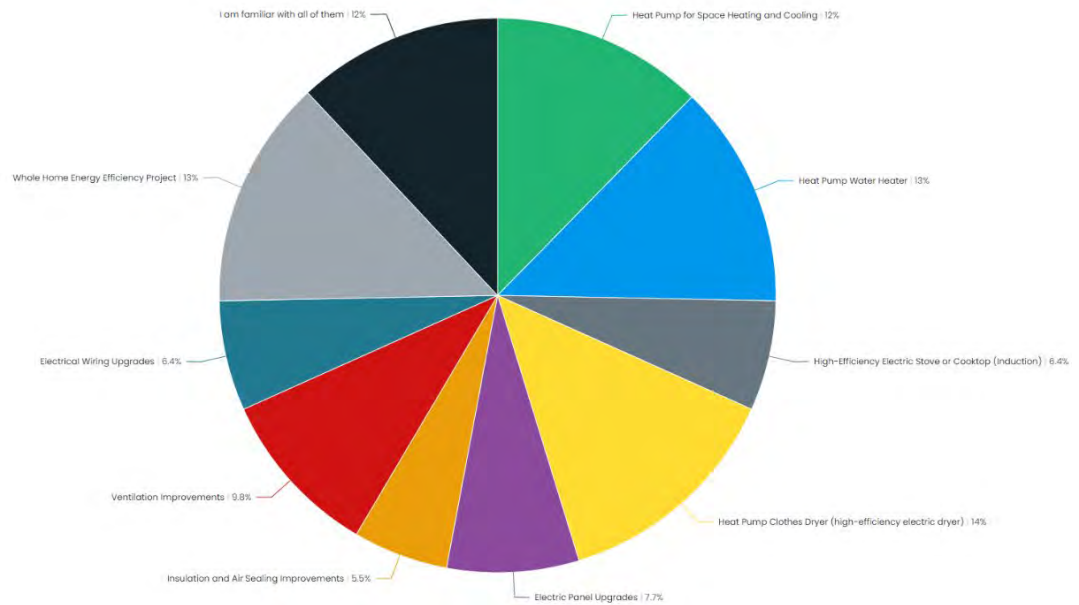
Please select all equipment or upgrades you would be interested in installing in your own residence:



Survey respondents were also asked what types of equipment technologies they were not be familiar with. For each option provided, 6-14% of respondents were unfamiliar with the technology. Most respondents also had an interest in learning more about equipment they were unfamiliar with, indicating the value of ongoing education and outreach regarding eligible equipment types.

Chart 5: Unfamiliar Equipment

Are any of the equipment or upgrades (potentially available through the program) unfamiliar to you?

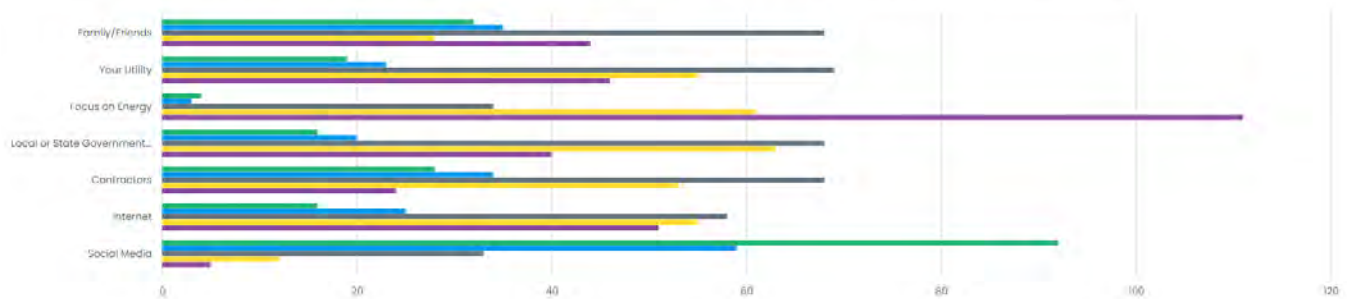


Question 3: Who do you trust most to learn more about improving your home or reducing energy use? Is there a second, and a third?

Focus on Energy was reported as the most trusted source (5 = Very Likely, N = 111, Purple bar) for reducing home energy use by a large margin. Family/Friends, Utility, Local or State Government, and Contractors all had even distribution as the next most trusted source (3 = Somewhat Likely, N = 68-69, Grey bar). Social Media was the lowest relied upon information source by a wide margin (1 = Not at all Likely, N = 92, Green bar).

Chart 6: Trusted Information Sources

Which sources of information are you likely to rely on when you want to learn more about improving your home or reducing energy use? (Select one option per row)



Question 4: When making home energy upgrades, which three factors are most important to you?

Saving money was reported as the most important factor when making home energy upgrades. A close second was reduced energy use. Living in a healthier home and lowering environmental impacts were both nearly tied for third most important factors.

Improving home value did not seem to be a strong motivator amongst respondents.

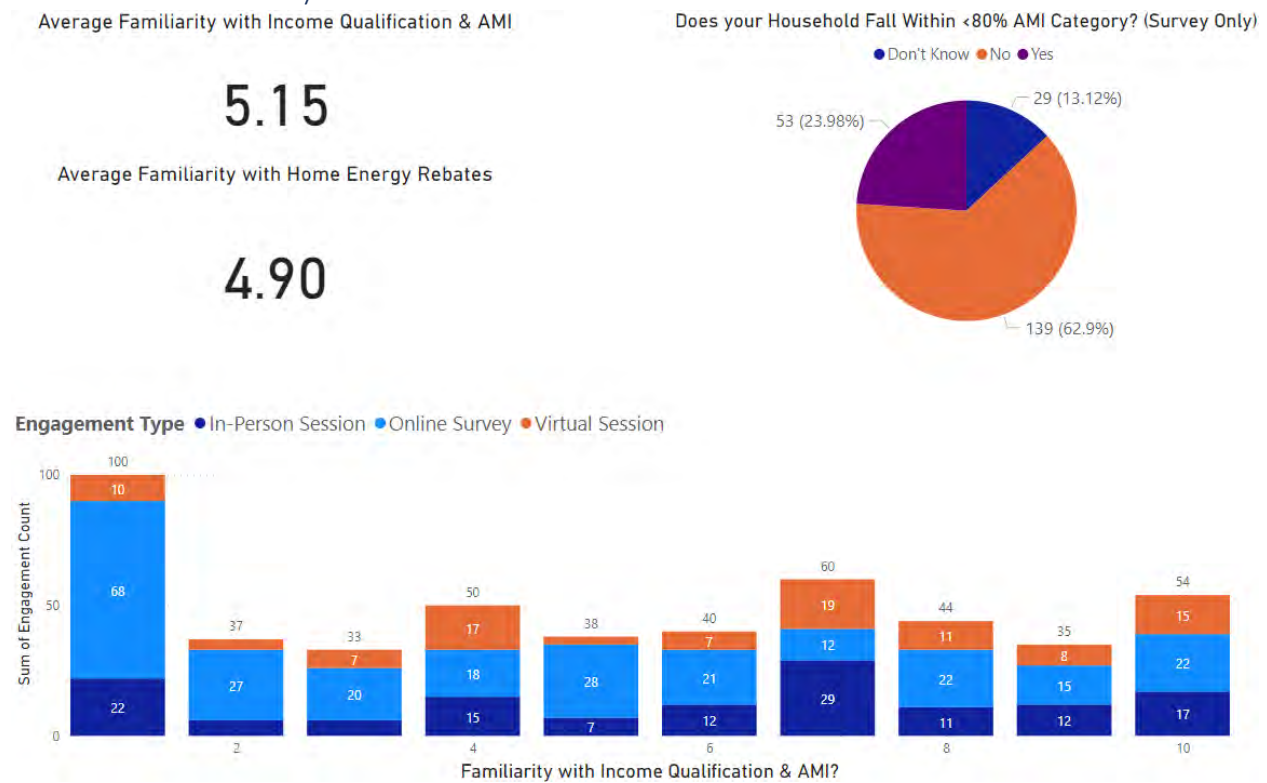
Question 5: Home Energy Rebate Programs are primarily intended to serve low-income (<80% AMI) and moderate-income (80%-150% AMI) households based on the Area Median Income (AMI).

On a scale of 1-10, how familiar are you with income qualification and the AMI?

1 = Not familiar at all, 10 = Very familiar, know the AMI population statistics

Familiarity with the topic of income qualification and Home Energy Rebate Programs was average across respondents. In general, in-person and virtual session attendees were slightly more familiar with income qualification, while online survey respondents were slightly less familiar. Online survey respondents indicated the AMI category that best applied to their household.

Chart 7: AMI Familiarity

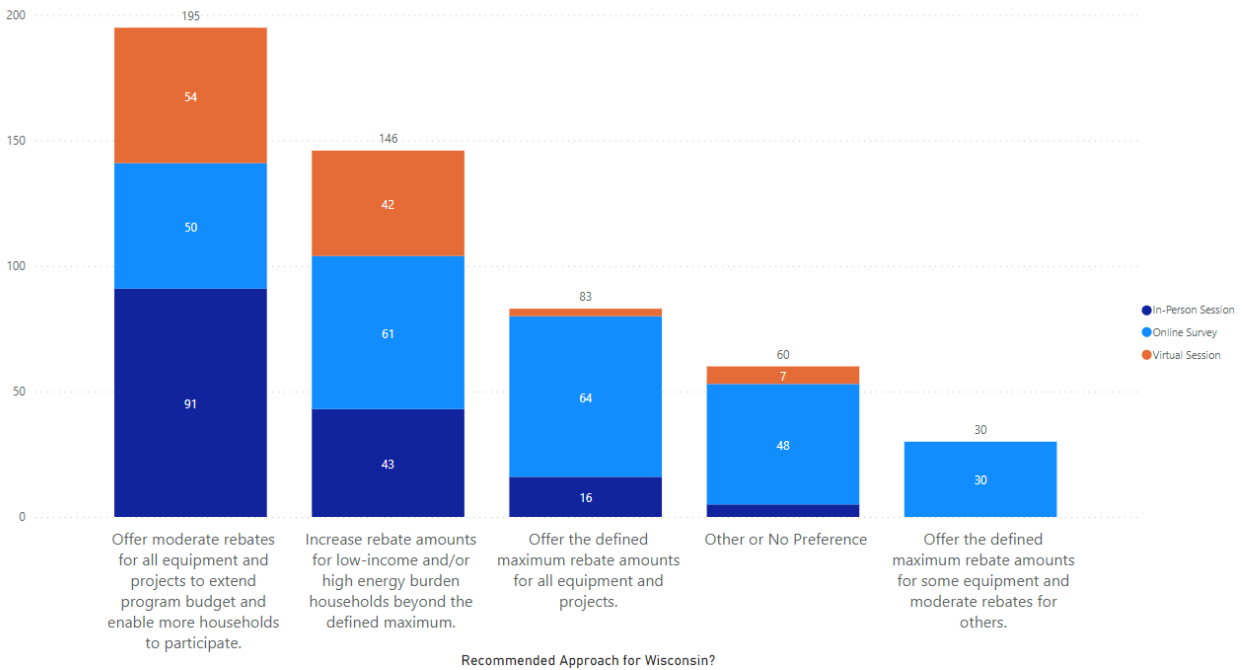


Question 6: Which approach would you recommend for Wisconsin?

Overall, responses indicate a preference for a moderate rebate amount approach to maximize participation, along with increasing rebate amounts for low-income households. Focusing on low-income households was a common theme across engagement activities, with an overall preference towards prioritizing low income and energy burden households. Respondents also prioritized balancing program delivery to maximize energy savings and provide all households the opportunity to participate.

Chart 8

Respondent Recommended Approaches by Engagement Type



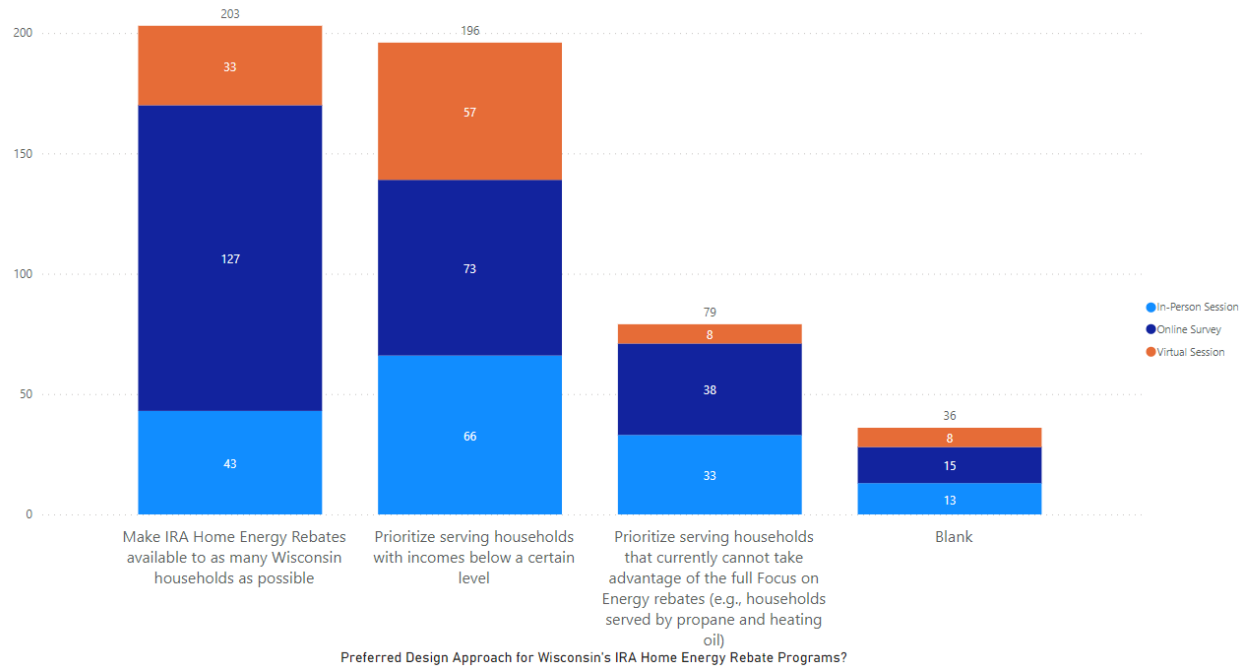
Question 7: Which approach would you prefer Wisconsin use in structuring its IRA Home Energy Rebate Programs?

A slight majority of respondents prefer that Wisconsin make these rebates available to as many households as possible. Similarly, respondents expressed a preference in prioritizing households with incomes below a certain level. There was a moderate number of responses indicating a preference to serve households that have historically been ineligible to participate in Focus on Energy. Responses diverged depending on the engagement type, with online survey respondents preferring a “maximum household approach,” while in person and virtual session participants slightly preferred rebates to be prioritized for lower income households. There was a noticeable shift in attendee sentiment at in-person sessions when participants learned how many households in Wisconsin could potentially be served by these programs. Attendees had assumed funding and reach of Home Energy Rebates was larger and expressed surprise funds could be exhausted. While it is difficult to assess how much sentiment shifted (if at all) or how responses would have differed without that knowledge, some attendees voiced that it changed their preference to target these funds for lower-income households. At several locations, participants added that rebate amounts could be set based on their anticipated impact (presumably

energy savings impact) or suggesting a sliding scale for rebate amounts based on applicable factors such as household income, energy savings potential, or both.

Chart 9

Respondent Preferred Design by Engagement Type



Question 8: Do you have any suggestions on how Wisconsin’s IRA Home Energy Rebate Programs can best reach disadvantaged, high energy-burdened, and/or low-income communities most effectively?

A short summary of themes is provided here, with a more extensive list of comment notes in the appendix.

- Participants stressed the importance of strong coordination and partnership with the State’s existing Low-Income Heating and Energy Assistance Program (LIHEAP) and Weatherization Assistance Program (WAP). Participants suggested that the benefits would be twofold: 1) efficient identification of homes that may be eligible for funds, thus reaching disadvantaged customers, as well as 2) to better serve these households and improve their homes with modern, efficient equipment that may reduce their need for public energy assistance in the future.
- Participants stressed the importance of working with community-based organizations – some of which already serve low-income and disadvantaged communities – to spread awareness of the program once available as well as the potential for these organizations to help customers through the participation process (if they are trained).
- Have staff do direct outreach and help participants through the program.

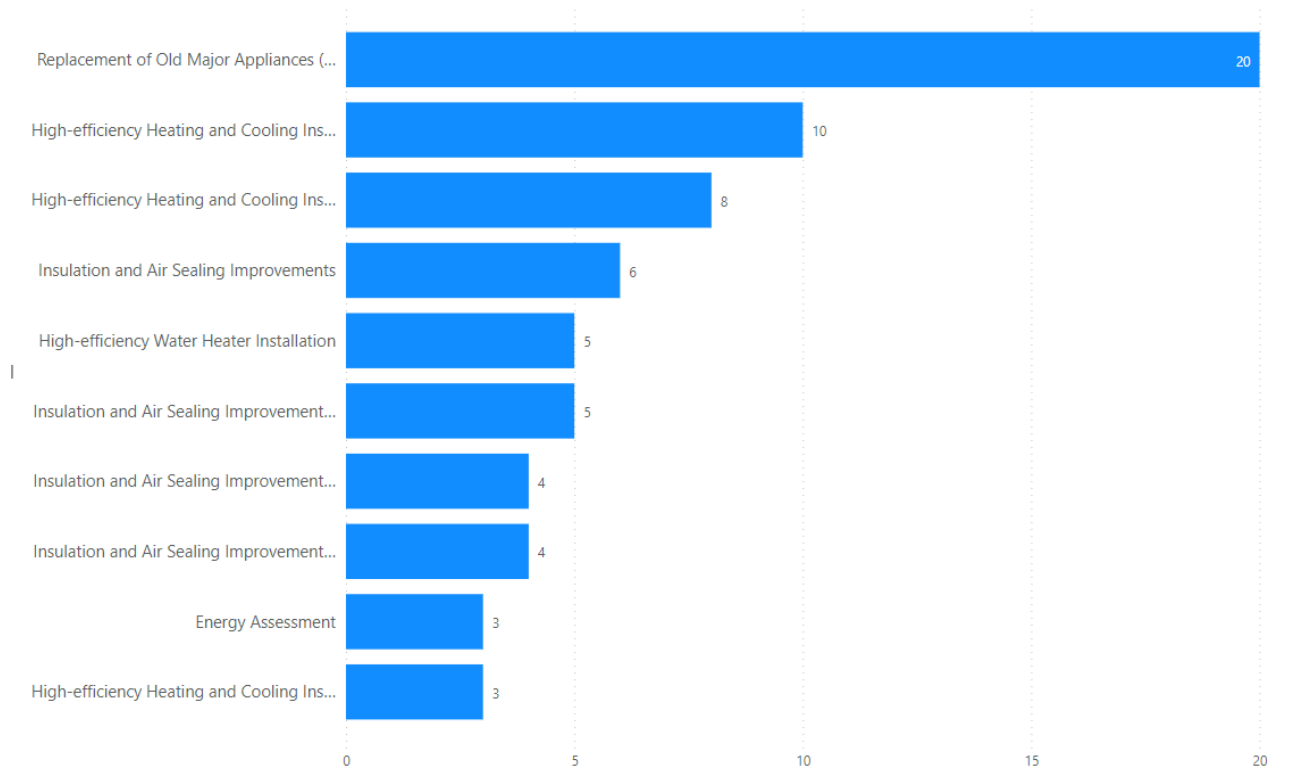
- Engagement with landlords will be essential to ensure that renters, often low income or disadvantaged, also benefit from these programs.
- Senior centers and the Wisconsin network of Aging and Disability Resource Centers (ADRC) are an effective way to reach some older adults to spread awareness of the programs.

Question 9: Regarding Efficiency Program retroactivity, how restrictive should the state be on timing of income qualification?

Based on in-person sessions, participants favored a more restrictive approach to retroactive rebates, while virtual attendees preferred a less restrictive approach. Respondents were asked if they had done any work that could potentially be eligible for IRA Home Energy Rebate program participation. A majority answered “no” or that they had been waiting for program launch to participate. Online survey responses, charted below, indicate that appliances, heating/cooling equipment, and insulation/air-sealing were the most completed work, but these counts were low compared to total responses.

Chart 10: Equipment Recently or Planning to Purchase

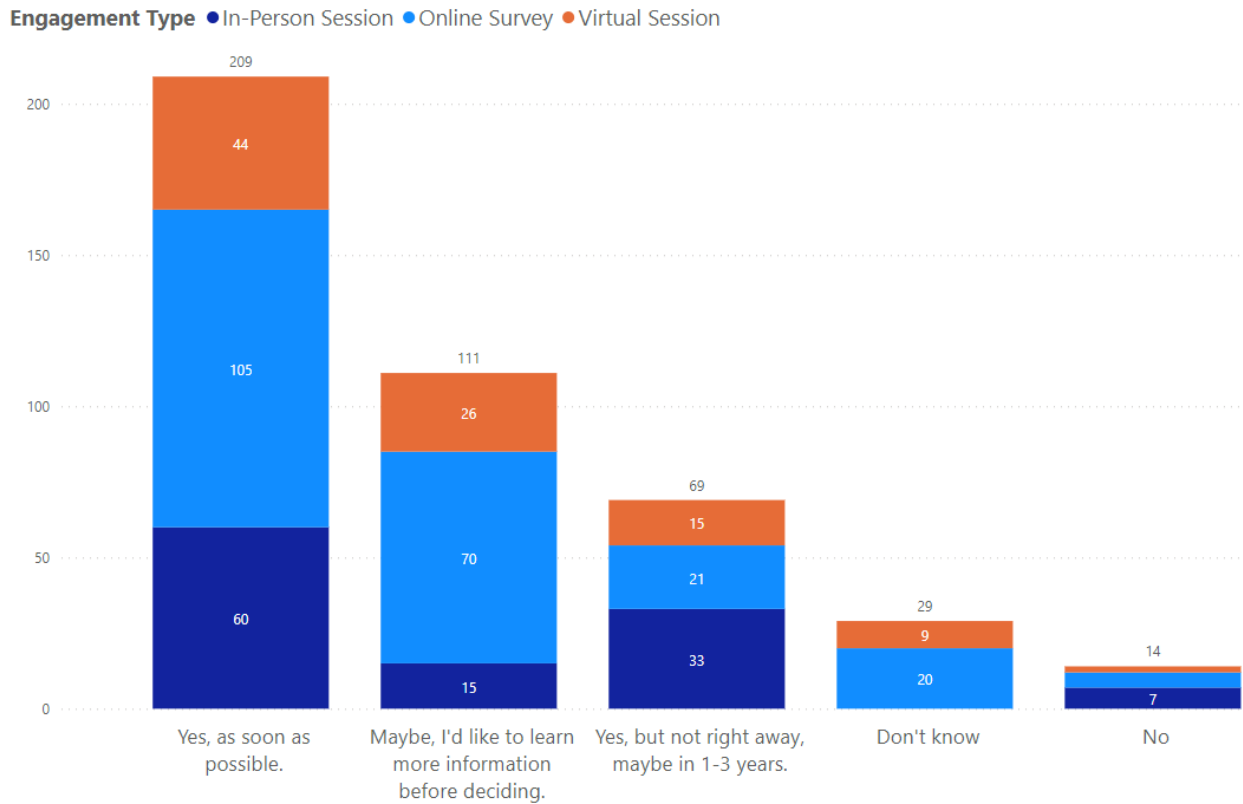
Retroactivity: Any of the Following Work Completed in the Past Year (2023) or Scheduled in 2024? (N > 2)



Question 10: Based on what you currently know, as a resident, do you plan to participate in Wisconsin’s IRA Home Energy Rebate Programs?

A strong majority of participants and respondents indicated that they plan to participate in the program as soon as possible (assuming program launch in 2024) or within the next three years.

Chart 11: Program Participation Timing
Plan to Participate in Wisconsin's IRA Home Energy Rebate Programs?



Question 11: By show of hands: Would you feel comfortable sharing your energy bills (1 year before and after project) directly, if required to participate?

This question was only posed during in-person and virtual sessions. Participants responded favorably to providing energy bill data if required to participate.

Follow up: Would you be willing to provide this on your own, either from your online utility account or through a mail-in request?

Participants responded favorably to providing energy bill data themselves, if required to participate.

Follow up: As part of participation, would you prefer to sign a release form allowing your utility to provide the data on your behalf?

Participants responded most favorably to this approach. Many participants expressed verbally that this was their preferred method as it would be the easiest.

Some participants did say that they would not prefer this approach as they did not trust their utility to provide data and would rather provide the data themselves. This suggests that options for providing energy usage data may improve customer experience and program access.

Question 12: Open Comment

A summary of themes is provided here, with a more extensive list of comment notes in the Appendix.

- Attendees at the engagement session in Ashland raised the issue that there are no available energy assessors on Focus on Energy's "Find a Trade Ally" tool for their area. This is likely true of other rural areas in Wisconsin. As expressed by community members, this is an equity and accessibility concern as this could mean their community is excluded from the HOMES program because they cannot receive an energy assessment. Concerns over auditor availability were also raised in Viroqua/Vernon County.
- At several in-person locations, the cost of an energy audit was raised as a barrier, particularly for low-income homes, to access and participate in the home retrofit program despite potentially having the most to gain from the program's benefits.
- The path to participate must be easy and straightforward, particularly to understand which programs and rebates a customer is eligible for and what the resulting energy bill benefits might be.
- The path for eligible Do-It-Yourself (DIYA) installations should be clear and easy to understand to improve access to these funds.
- Public excitement for these federal funded programs is high, and people are hoping to be eligible to receive these program benefits to lower bills and environmental impact sooner rather than later.
- All in-person, non-Trade Ally engagement sessions were held in Investor-Owned Utility territory. During these sessions, some community members expressed surprise and dissatisfaction after learning that they may not be eligible for an electrification rebate for an air-source heat pump for space heating and cooling if they were served by a natural gas utility due to potential utility bill cost increases.

Other Stakeholder Outreach Summaries

Feedback from potential program participants is extremely important, so is feedback from groups that will help deliver, partner, provide complementary services, and promote the IRA Home Energy Rebate Programs in Wisconsin. Below is a summary of several groups that were engaged.

Trade Allies and Program Partners

Trade Ally input is crucial to successful delivery of the IRA Home Energy Rebate Programs. While anyone was given the option to choose contractor for the open feedback sessions, most of our Trade Ally input was received in separate meetings. These meetings often include not only contractors but distributors,

manufacturers, and utility staff. Each year Focus on Energy and Xcel Energy put on Trade Ally breakfasts where updated program information and networking opportunities are provided. This year, IRA Home Energy Rebate team members were invited to speak about IRA Home Energy Rebate opportunities geared towards their program roles. Information was shared, a handful of general questions were asked, and open dialog was encouraged. The dates and locations of these breakfasts are below:

Focus on Energy Sponsored Breakfasts – 459 Registered Attendees	
City	Date
Green Bay	Tuesday, January 23, 2024
Wausau	Wednesday, January 24, 2024
Milwaukee	Thursday, January 25, 2024
Pewaukee	Friday, January 26, 2024
Madison	Tuesday, January 30, 2024
Xcel Energy Sponsored Breakfasts	
Onalaska	Tuesday, February 13, 2024
Eau Claire	Thursday, February 15, 2024
Ashland	Wednesday, February 21, 2024

During our information sessions, Trade Allies in attendance were shown a high-level overview of the two IRA Home Energy Rebate Programs. Trade Allies were then asked a set of questions designed to inform the IRA Home Energy Rebate team about various current market conditions. Listed below are the primary questions asked and a summary of responses.

Will your company likely participate in IRA Home Energy Rebate Programs when they launch?

- Most Trade Allies responded that they would likely participate in IRA HER Programs. Trade Allies stated that the reason for their affirmative answer was the opportunity to reach underserved and Low-Income communities with instant rebates. Trade Allies noted that this is also an opportunity to expand their customer base due to marketplace demand.
- Trade Allies who stated they were not likely to participate cited federal program “red tape” and the perception that there will be too many roadblocks to deliver the rebates to customers. Income qualification liability, federal audits at the contractor level, income approval wait times, and cashflow concerns were also common themes heard at multiple sessions.
- At the Ashland session, an assessor voiced concern that new programs will drive up demand and put even more stress on an already disrupted supply chain. One Trade Ally from the area reported having to drive to Wausau, approximately 129 miles, to purchase materials to complete insulation and air sealing projects. Material and labor scarcity in Northern Wisconsin may be a participation barrier.
- In Milwaukee, Trade Allies voiced concern over the amount of funding. There are concerns that businesses would increase their staff and program funding would run out. Trade Allies noted that they would like to be informed on the rebate availability throughout the program duration.

Would your company be interested in expanding the amount of work it does in disadvantaged communities if there were funding available to support contractor bonuses?

Not many Trade Allies responded to this question. Generally, three to five organizations in each session responded in the affirmative. For context, most Trade Allies on a day-to-day basis are not likely aware of whether they're working in a disadvantaged community or not.

Does your company currently assist customers with income qualification?

Three to five Trade Allies in each session said that they did have experience helping customers with income qualification. This is mostly through work with Focus on Energy's existing Income Qualified offerings. One Trade Ally did note that having multiple ways to income qualify a customer, including offline or over the phone options, will be helpful as we are trying to reach rural, disabled, or elderly customers who do not always have access to the Internet.

Do you agree with requiring envelope improvements be completed before HVAC upgrades?

Responses to this question were split, but most Trade Allies across all sessions agreed with this statement. Trade Allies who did not agree stated they disagreed in instances where health and safety would not allow shell work to be completed first or when shell work is not deemed necessary due to adequate condition of existing materials.

Do you have any other thoughts to share regarding Efficiency Program retroactivity?

All Trade Allies seemed to agree that retroactivity, in some form, is necessary given high market awareness of energy efficiency programs set to launch because of the Inflation Reduction Act. Trade Allies noted that many customers already expect to receive retroactive rebates for their pre-program launch projects; others noted current market-place confusion over what programs or measures would be eligible for retroactive rebates.

Some Trade Allies expressed concerns that less restrictive state-imposed retroactivity requirements could cause a surge in customers wanting to claim retroactive rebates for their projects, only to find out that their projects do not meet minimum savings requirements. Trade Allies also shared that they would expect to be compensated for the additional effort needed to assist customers with necessary documentation updates and the application process. The need for a clear, real world applicable policy, that considers the current state of the workforce was strongly expressed.

Open Comments

Following our formal survey of Trade Allies, we allowed time for Trade Allies to make comments and engage in discussion in the group setting. Some Trade Allies also stayed after session close and provided feedback directly to Program staff. Below are some common discussion themes:

- **Cash-flow** – Trade Allies voiced concerns that due to the large rebate amounts, it may be difficult for smaller businesses to hold the incentive while waiting for a customer payment.
- **Program Requirements** – Trade Allies stressed the importance of determining program requirements in all areas as soon as possible to allow them to prepare adequately for program launch. Insulation Installers and Home Energy Assessors both voiced the need to have a complete set of rules surrounding the energy assessments required for this program as soon as possible to allow for business to learn the software tools. It was suggested that once program design and requirements have been finalized, a training course would be helpful for participants.

- **Reaching customers with delivered fuels** – Trade Allies who work in rural Wisconsin expressed interest in being able to provide customers with delivered fuels rebate dollars. They suggested that working with electric utilities and delivered fuel providers would be the best way to reach this historically underserved population.

Utilities

Utilities themselves, or their representative organizations, provided useful feedback on program design, particularly regarding energy usage data. They will also likely play a significant role in the marketing of programs after launch. While most of our feedback interactions with utilities were through direct outreach, below are a few interactions to note.

- Provided an overview of the IRA Home Energy Rebate Programs at the annual Focus on Energy Utility Partners forum on December 5, 2023. Received feedback from utilities on program elements including access to utility data, promotion and marketing of the rebates, and customer journey.
- Met individually with some large utilities to explore potential pathways for accessing customers' utility data. Engagement on this issue is ongoing.
- Hosted an informational webinar and discussion forum for the rural electric cooperative members of the Wisconsin Electric Cooperative Association on March 11, 2024.

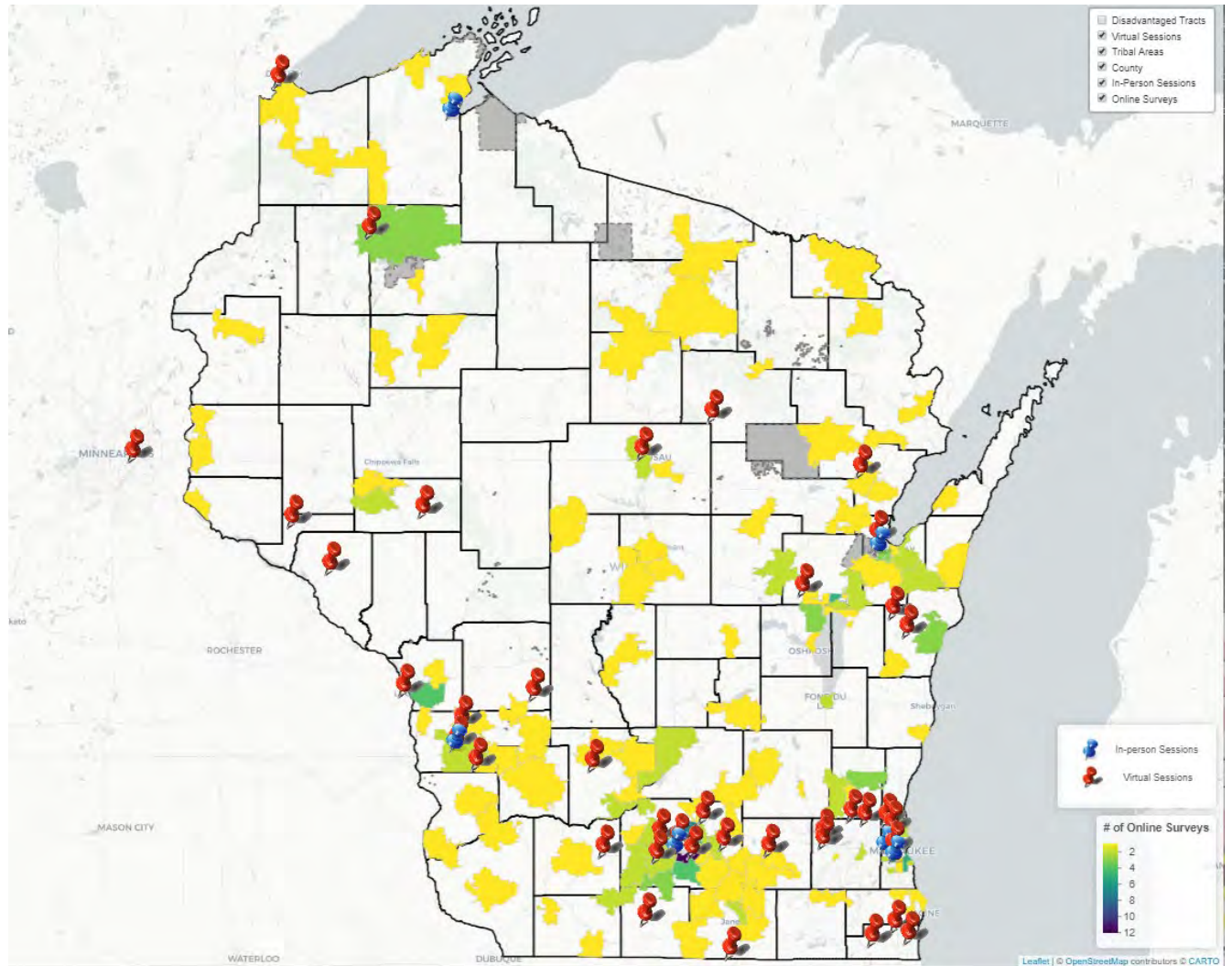
Other Groups

As noted, several groups were engaged with prior to events for planning and outreach purposes. From organizations that identified themselves through our feedback options, it is estimated nearly 50 organizations provided feedback.

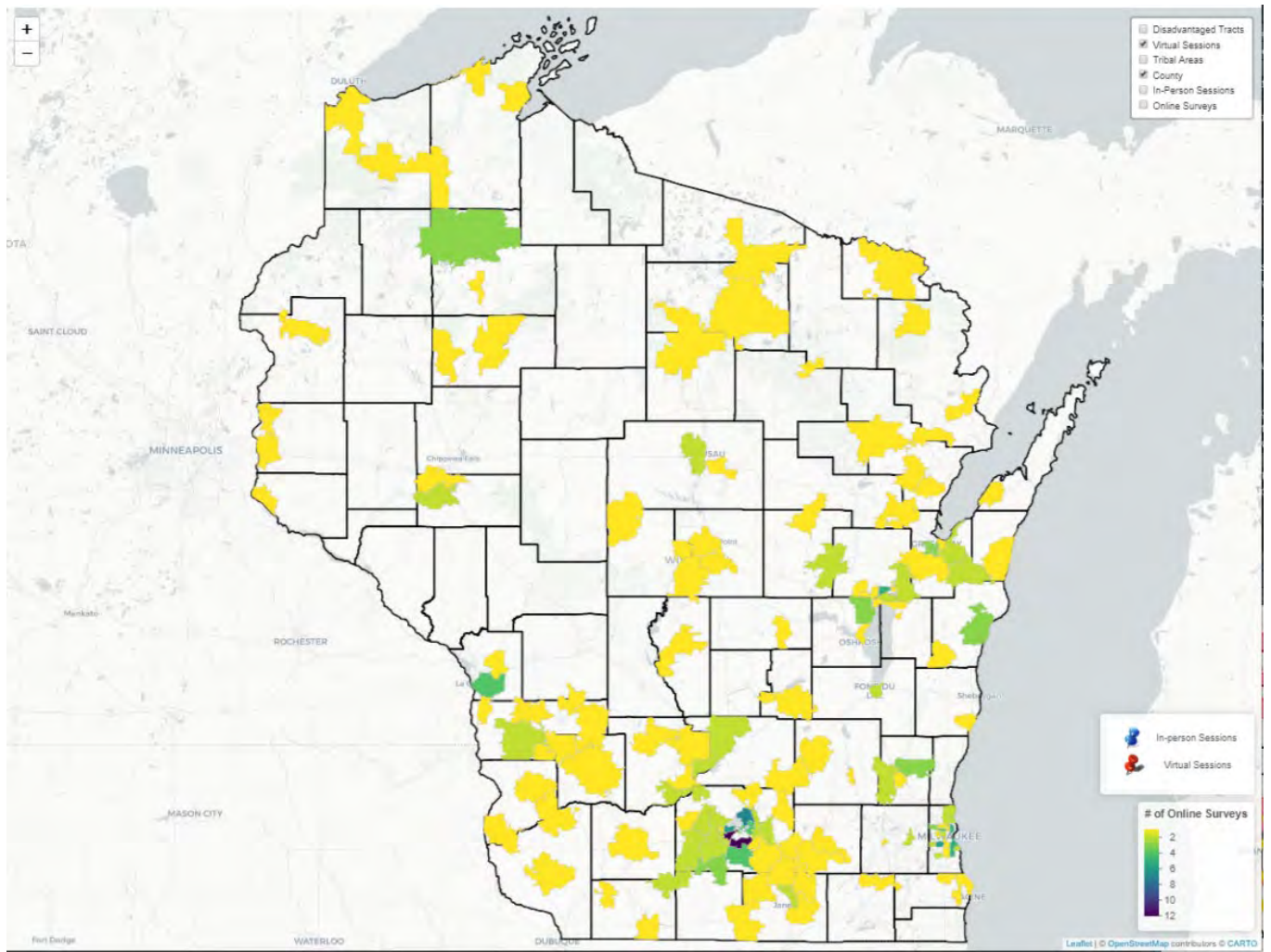
Appendices

Additional Maps

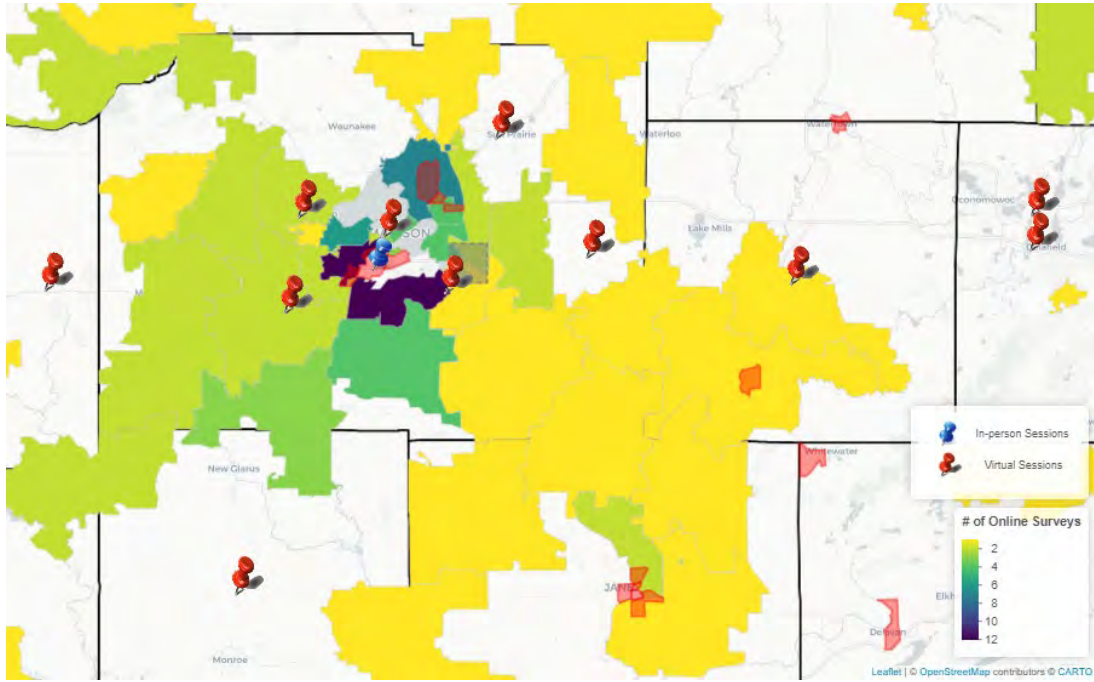
Map 2: Stakeholder Engagement Map - Tribal Areas (Grey)



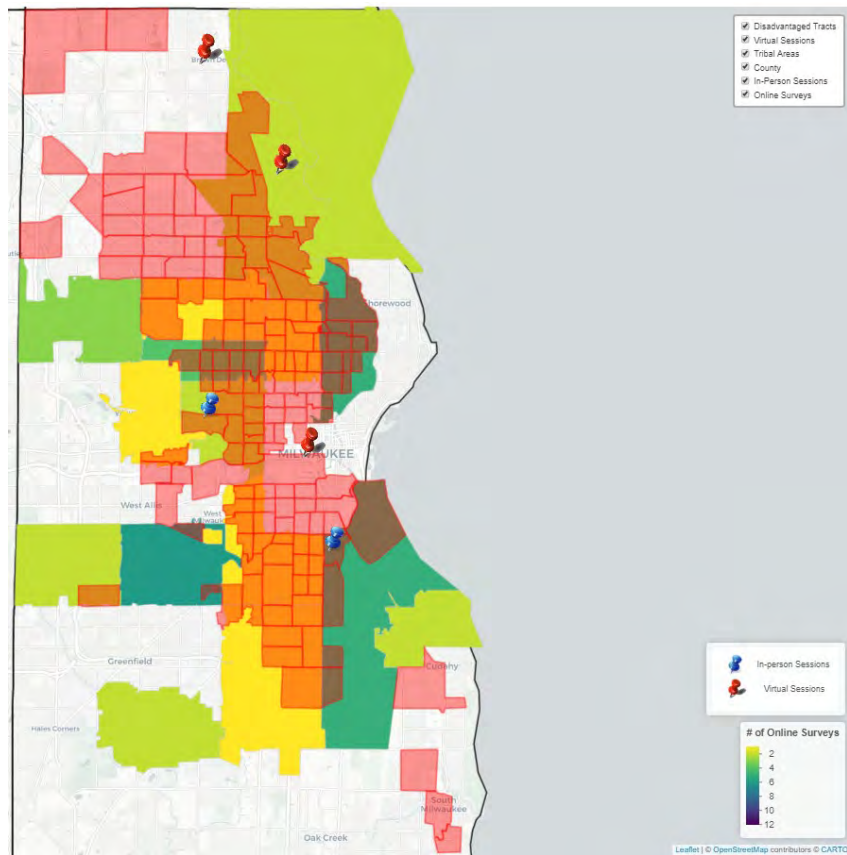
Map 3: Stakeholder Engagement Map - Online Survey Results by Zip code



Map 4: Stakeholder Engagement Map – Dane County



Map 5: Stakeholder Engagement Map – Milwaukee County



Online Survey Results

This information can be accessed in an interactive format using the below link:

[Online Survey Results – Interactive Data Explorer](#)

Question 8: Comments to Reach Disadvantaged Communities

- Ability to apply other than computers/online
- ACA Navigation Program (Guides)
- ADRC Partnership (x2)
- Avoid making it a centralized distro program
- Be everything to everyone
- Beware capacity issues when collab/partner w/tribes & local municipalities.
- Bus signs
- CAP rebates at 150% AMI
- Categorical eligibility needs one stop shopping so folks know all the programs they qualify for, and actually sign up all at once
- Certify/train to support new contractors (x2)
- Church outreach, neighborhood assoc. etc. (x2)
- Communicate with Landlords (x2)
- Communicate with locals/develop a local approach
- Community ambassadors (x3)
- Community Based organizations (x3)
- Community outreach like CAP social services and partner agencies (x2)
- Contractor education, homeowner education, joint marketing
- Contractor incentives/education/multi-lingual
- Contractor partnership/referrals (x2)
- Cost of audit is a barrier to participate
- Counties, meals on wheels
- Dane County planning and zoning, housing
- Direct Contact/Face-to-Face Interactions/Door to door (x5)
- Don't reinvent wheel
- Ease of access (x2)
- Easy to use tool
- Energy Navigator already targets landlords
- Existing database of past energy assistance needed or weatherization
- Financial institutions, credit unions, banks, WHEDA (x2)
- Fund local energy districts to advise/navigate
- Good relationships with vendors, utility partners
- Grocery store or magazine advertisements
- Heating contractor can communicate details of program and spread the word
- Improve energy assessment
- Informational Outreach Programs
- Instant discount - any money out of pocket is a deal breaker and a barrier to participate (x2)
- Local and large chain retailers (Menards, Home Depot) (x2)
- Local rebate instruction assistance ("How-To") (x4)
- Make rebates available ASAP
- Media, TV, Radio, Billboards (x2)
- Meet people where they are at
- Multifamily house (x2)

- Muni-Clerk w/ sanitation and sewer to ID LI tenants
- Neighborhood associations, groups, planning councils (x3)
- No auditors available in the area
- Omit direct income verification restrictions, requirements
- Outreach to rural areas and counties
- Owner occupied Multifamily.
- Partner with CAP agencies Weatherization
- Partner with community influences as trusted messengers
- Partner with local governments (x3)
- Podcast
- Provide Weatherization program info (x3)
- Provide wide breadth of education
- Public libraries (x3)
- Radio, Tv, account for those without internet
- Radio/outdoor advertising (i.e. Bus stops)
- Radio: WPR, WDRT, WORT. WVRQ
- Reach out to media
- Real estate connections, realtor associations
- Renters
- Schools (x3)
- Send a box or tickets to Packers Bucks or Brewers games
- Senior/Community Center (x3)
- Social media advertising (x3)
- social service departments at counties
- Spot ads on evening news and radio
- Streamline income verification ala census tracks, individual income
- Survey through medical care provider x2
- Tabling at high traffic businesses (i.e. Grocery stores)
- Tax Forms, IRS connecting to programs to match eligibility
- Through the city with 1st time homebuyers
- Trusted community groups, churches, food pantries, health centers, St. Vincent De Paul home visits
- Understand threshold where rebates aren't priority
- Understand where the households go for their needs now
- United Way - mobile resource bus
- Use census tract data, work with utilities, identify high energy burden, framed with non-e saving group
- Use neighborhood non-profits as liaisons/training (x2)
- Utilities ID high-energy users
- Utilities, WHEAP, Utility usage information, ID consumers in target areas
- Utility company sourced list of low-income residencies (x2)
- VCED (Vernon County Energy District)
- WEAP (2 attendees work here) is successful because it's a one-stop shop
- Web interface similar to "Rewiring America"
- Well-designed flyer included with utility bill
- WHEAP, SNAP, WIC, School, Library, Social Security, Medicare, military recruiters
- Work with local agencies and in person training
- Work with non-profits and other orgs
- Work with state and county landlord associations
- Prioritize serving households with incomes below a specific level, utilizing targeted outreach in partnership with schools, places of worship, neighborhood associations, and other trusted community leaders.

Questions 12: Open Comments

Online Survey open-ended responses to the question “Do you have any other questions or comments about Wisconsin’s IRA Home Energy Rebate Programs you’d like to share with us?” were summarized and anonymized below. Items in bold are recurring themes.

- **Enthusiasm for the program's rollout to begin high-efficiency improvements.**
- Newly aware of the program through 350 WI promotion and expressing gratitude for the effort.
- Suggestion to include renewable energy technologies such as microgrids, battery storage, and generators due to grid capacity concerns.
- Questioning if the rebates are in addition to federal ones or a local implementation.
- Request for rebates to be directly available from contractors at the time of purchase.
- **Anticipation for the program to enable the purchase of a new air source heat pump, with concerns about readiness timing.**
- Inquiry about inclusion of replacement windows and appliance rebates or credits.
- Frustration with delays leading to a proactive purchase of an induction stove, with hopes for retroactive rebates.
- **Challenges faced with the lack of local companies for home assessments and contractor availability within the program.**
- **Questions regarding the definition of "income" in AMI and the program's implementation timeline.**
- Inquiry about eligibility with natural gas heating and inclusion of windows.
- Suggestions to adjust rules for more solar panel installation and to subsidize them further.
- Desire for more information about the program and concerns about exclusion of certain upgrades.
- Concerns about the feasibility of project completion and affordability.
- Inquiry on application process and timing for electrical panel rebate availability.
- Negative experiences with the program leading to dissatisfaction.
- **Question on how to get an energy assessment and its total cost.**
- Emphasis on understanding energy usage in residences and businesses for targeted savings.
- Praise for the program's impact on reducing eco-footprint for those unable to afford upfront costs.
- **Concerns about potential price inflation by contractors and eligibility for DIY installations.**
- **Inquiry on the collaboration with HVAC contractors for point-of-sale rebates and concerns about accessibility for those unable to cover initial costs.**
- Suggestions for mobilizing property owners, especially for rentals, through group buys and discounts.
- Proposal for offering high-efficiency wood-burning stoves as a backup heat source for low-income families.
- **Requests for assistance for non-computer users in learning about rebate programs.**
- Concerns about the timing of replacing major systems like furnaces and AC units due to potential cost increases from waiting for rebates.
- Question about the meaning of "IRA" in the program's context.

- **Requests to open the program to DIY installations and purchases from stores like Menards to avoid long waits and increased costs through Trade Ally Partners.**
- Suggestions for clarifying income eligibility checks and promoting the program through webinars with climate-focused organizations.
- Requests for retroactive rebates for homeowners who made improvements in 2023 in anticipation of the program.
- Desire for more specific program details and a swift program launch.
- Suggestion for training contractors on educating consumers about heat pumps.
- **Inquiry about program applicability to renters.**
- **Concerns about public awareness of fund availability for upgrades and the speed of program implementation.**
- **Emphasis on the need for navigators to assist with the application process, especially in lower-income communities.**
- Praise for the program's potential impact on cleaner energy and health improvements.
- Calls for increased public information and community involvement in the program's success.
- Recommendations for workforce training within communities and data tracking on program outcomes for transparency and efficiency.

Virtual Notes

- We need a strong TA outreach and education plan.
- Energy burdened homes are more challenging to reach. Make sure to get info to people in ways they can receive it.
- Disseminate information through regional energy districts.
- Green banks could be a helpful ally as residents may have trouble paying upfront cost.
- Retroactivity – make sure dates and programs are extremely clear.
- Shell before HVAC may not be consumer friendly.
- Make apps easier for seniors/Medicare-aged individuals – not just online.
- Consider communication method.
- Do direct outreach through social service agencies to reach target households.
- Make resources available in multiple languages!
- Encourage full home decarbonization in addition to energy neutral measures like insulation.
- Include gas appliances into rebate programming that improve air quality within a home.
- Make a one stop shop for learning about incentives.
- Increase tenant safeguards applying restrictions in rent increases by increasing 2-year mandate to 5-year mandate.
- Ensure increases affordability to as many groups as possible with focus on low and moderate.
- State should require more than DOE mini comm benefits plan by partnering with culturally appropriate community partners w/ trust within community& provide support to community partners.
- Include a methane reduction metric.
- Offer instant discounts – will be helpful to underserved communities, so that there is no or less outlay of cash.
- Do in person outreach when program launches – especially to seniors who are not tech savvy.

In-person

- High rebates will lead to better accessibility for low-income families

- Don't leave money on the table, and use the federal money to the full ability
- WHEAP application is challenging to complete
- When will trade allies be identified for the program?
- Are self-installs going to be eligible, and how would that work?
- Taking advantage of both programs (Homes and Electrification), are customers able to do so?
Ex: furnace in both programs
- Worried about assistance, filling out forms, finding public docket