

**December 2023 Stakeholder Input Received on Implementation and Design
of the Inflation Reduction Act – Home Energy Rebate Programs and Contractor Training Grants
March 2024**

Context

NYSERDA held a virtual public information session on the topic of the Inflation Reduction Act’s (IRA) Home Energy Rebates and Training Grants for which over 1,600 people registered and nearly 1,300 individuals participated. Before, during, and after the webinar, NYSERDA received over 350 questions and close to 60 written and verbal comments.

Stakeholder input helped inform NYSERDA’s accelerated partial application, submitted to the Department of Energy (DOE) in December 2023, for certain Home Electrification and Appliance Rebates (HEAR) rebates to be delivered to low-to-moderate income (LMI) residents through NYSERDA’s EmPower+ program. NYSERDA submitted a partial-scope application for approval to DOE in January 2024, which is currently awaiting final review and approval as of the date of this publication. We expect this initial HEAR funding to be available through EmPower+ in the summer of 2024.

NYSERDA has organized stakeholder input into the two tables below: one for comments and the other for questions, which were organized by key themes. Responses provided are current as of this publication. We thank all attendees and participants for their time, dedication, and insights in helping maximize the impact and reach of these federally funded programs alongside New York’s existing programs. NYSERDA will continue to solicit feedback from stakeholders throughout the planning, design, and delivery of these programs.

NYSERDA plans to host ongoing stakeholder engagement sessions in the first and second quarter of 2024. Upcoming focused session topics include multifamily, retail point of sale, and reaching the 80 to 150% area median income (AMI) market. Stakeholders are also encouraged to join the quarterly [Residential Market Advisory Group Meetings \(RMAG\)](#) which will provide opportunities for information, discussion, and feedback to all residential sector stakeholders. Additionally, NYSERDA will continue to accept IRA related stakeholder inquiries and feedback via email at residential.ira@nyserdera.ny.gov.

Table 1. Summary comments received from stakeholders on the IRA Home Energy Rebate Program

Thematic Commentary	What We Heard
Outreach and Engagement	<ul style="list-style-type: none"> • Stakeholders would like to see more opportunities to provide input into the submitted program proposals, with as much lead time as possible, while also acknowledging NYSERDA’s efforts to balance the level of effort needed to process the complex rule sets mandated by the IRA legislation and the DOE while getting these programs to market as rapidly as possible. • Some commenters requested NYSERDA provide tools and data sets to help support outreach and market engagement.
Program Design	<ul style="list-style-type: none"> • Comments emphasize delivering IRA Home Energy Rebate Program funds with proactive budget stewardship to make funding readily available as soon as possible while also seeking to, at minimum, maintain consistent levels of overall funding year over year in the mid- and long-term to avoid the impacts of rapid boom-bust funding cycles on contractors, service providers, outreach partners, and customers. • Stakeholders suggest leveraging existing program infrastructure (e.g., rules, systems, tools, etc.) at NYSERDA with other NYS program administrators.

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Program Design	<ul style="list-style-type: none"> Stakeholders seek a streamlined program experience and ease of access for homeowners by actively supporting contractors in helping their customers secure all eligible incentives from various programs. Several suggested NYSERDA use/create an online contractor/customer tool to facilitate accessing incentives; many requested streamlined processes; and several called for a single common application across programs. Commenters support Home Efficiency Rebates (HER) and HEAR incentives being delivered by qualified contractors with relevant credentials. Stakeholders would like the IRA HER and HEAR incentives to be “stackable” with other funding sources (e.g., ratepayer funding, NYS FY24 budget allocation for EmPower+, etc.), within reasonable guidelines. Many advocated for prioritization of envelope measures prior to installing heating electrification systems. Stakeholders offered differing views on how to prioritize certain building types, demographics, geographies, and/or technologies. Some commenters advocated for using the measured savings approach for the HER rebates; others suggest using the modeled approach, with some recommending specific models or calculation methods; and some call for both approaches. Some commenters recommend allowing retroactive rebates for projects that were completed prior to the release of IRA HER/HEAR funding into the New York market; others discouraged this practice, while others recommend it, but with certain limitations on what types of projects should be eligible. Stakeholders suggest following the NYSERDA Low Carbon Pathways program processes for categorical eligibility of low- and moderate-income (LMI) multifamily buildings. Comments suggest pre-qualification for community-based organizations supporting affordable housing; many constituents call for non-profits and co-ops to be eligible for Home Energy Rebate Program incentives. Several individuals made suggestions on technology specifications, pairings, and other rulesets to define qualified measures and projects.
Program Implementation	<ul style="list-style-type: none"> Some individuals recommended utilizing proprietary software, tools, and/or services to implement Home Energy Rebate Programs; others suggest using open-source resources. Several people offered suggestions on customer marketing and outreach methods.
General	<ul style="list-style-type: none"> Stakeholders recognize that with New York State’s (NYS) IRA HER and HEAR allocations there is opportunity for improving many NYS residences, but that more funding is needed to meet climate action goals; a financial advisory group was suggested to support this need. Several people recommend that NYSERDA not use federal funds to reduce ratepayer funded incentive programs, but to maximize the use and unique flexibility of different funding sources, and to seek sustainable overall funding levels even after the federal money is expended.

For expediency, the 350 questions are organized into themes, presented in **Table 2** below. Responses provided are at a high level given the uncertainty and unknowns that have yet to be worked through with DOE on the full HEAR and HER application, build-out, and launch. Questions received that did not pertain to the Home Energy Rebates Program planning have been referred to the appropriate team within NYSERDA to provide responses separately.

Table 2. Summary of IRA Home Energy Rebate Program Questions Received and Responses

Themes	What We Heard	NYSERDA Response
Access to information	When and where will reporting and dashboards be available?	NYSERDA is presently designing NYS’ IRA Home Energy Rebates Program delivery and its related program and system requirements. This will enable accurate accounting and visibility for available funding and other key metrics. NYSEDA will continue to solicit stakeholder feedback as needed throughout the planning process, regarding the means by which we make this performance data transparent to our partners and the public, in addition to the required DOE reporting.
Clarification of how local jurisdictions will be involved	How will NYSEDA funded regional Clean Energy Hubs be engaged?	The Hubs are an integral resource to connect customers to all eligible programs, including programs dispersing Home Energy Rebate funding, and will be trained and supported to ensure they can easily navigate customers to the programs that meet their needs, including other non-NYSEDA related social services resources.
	Can NYSEDA incentives be applied if a homeowner installs a heat pump and certifies the installation through the local authority having jurisdiction?	As the entity responsible for compliance with all IRA Home Energy Rebates Program rules and requirements, it is likely that NYSEDA will need to verify the quality and completeness of the work, in addition to the local authority responsible for code compliance.
Generating Interest	Clarify how NYSEDA will build contractor interest	Significant training, toolkits, resources, as well as a streamlined common application, and support for additional training will be provided to contractors to ease their ability to layer multiple programs’ incentives (where allowed) to provide the best offer and experience to their customer.
How can I be an implementation vendor?	Clarify how vendors can get involved in supporting NYSEDA with implementation	NYSEDA is in the process of developing our implementation needs. Implementation contracts will be issued using our standard procurement processes. Interested parties may sign up for NYSEDA’s Funding Opportunities mailing list . NYSEDA lists all funding opportunities on the Current Solicitations and Funding Opportunities, PONs, RFPs, RFQs, and RFQs - NYSEDA website.
How will it work for multifamily buildings?	Clarify how coops and condos can apply	Multifamily building owners, including co-ops and condos, will be eligible to receive incentives through Home Energy Rebate Programs supporting both energy efficiency and electrification improvements.

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	Clarify how it will work for multifamily buildings	NYSERDA is currently working on developing an implementation plan for deployment of these rebates among multifamily buildings. NYSEDA will continue to solicit stakeholder feedback during targeted working group sessions.
How will funding allocations and rebates work?	Clarify the following: <ul style="list-style-type: none"> • Total funding allocations between market segments • How one can participate • Project eligibility • NYSEDA policies on measure selection criteria • Rebate stacking • How rebates and incentives will be paid 	NYSEDA is presently designing NYS' IRA Home Energy Rebates Program delivery, including details for overall project eligibility and funding allocations. NYSEDA will continue to solicit stakeholder feedback as needed throughout the planning process. Further clarification about eligibility determination, systems and processes, rebate stacking, and payment is being clarified with our DOE counterparts. This eligibility information will be clearly communicated to our stakeholders and market partners upon receipt of clear direction, in advance of program launch.
How will it work?	Clarify who will be the lead rebate implementation agency	As New York's State Energy Office, NYSEDA has primary responsibility for implementation of the Home Energy Rebate Programs as required by law under the IRA.
	Clarify how retailer/point of sale will work	NYSEDA is presently designing NYS' Home Energy Rebates Program delivery including details for how retailer point of sale incentives will be processed. NYSEDA will continue to solicit stakeholder feedback as needed throughout the planning process.
	Will there be retroactive eligibility for purchases in 2024?	Retroactive incentives are not allowed under the IRA HEAR program rules. NYSEDA is currently reviewing DOE guidance on retroactive incentives for the IRA HER program and stakeholders' range of viewpoints on the subject.
	Clarify the quality assurance/Consumer Protection Plan	NYSEDA is presently developing a draft Consumer Protection Plan and Community Benefits Plan in collaboration with our stakeholders. Additional information and opportunities to provide input will be available in forthcoming stakeholder meetings.
	Clarify modeled and measured approaches.	DOE's IRA Home Energy Rebates Program Requirements and Appliance Rebates Instructions includes rules for the modeled and measured approaches for HER programs. The

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	<p>Please clarify whether any programs and funding pertain to embodied carbon or whether all programs and funding pertain to operational carbon.</p>	<p>modeled approach uses calibrated home energy models consistent with the BPI-2400 standard to estimate energy savings predicted to achieve a minimum of 20% energy savings. The measured approach uses a DOE-approved open-source measurement and verification (M&V) methodology to measure home energy savings, post-installation of the upgrades, to achieve a minimum of 15% energy savings over a portfolio of homes.</p> <p>The IRA Home Energy Rebate Programs are not specifically designed to measure carbon impacts. However, carbon reduction remains a primary goal for NYSERDA and NYS in compliance with our Climate Act and in pursuit of the requirements outlined in the Scoping Plan.</p>
<p>LMI and Disadvantaged Communities (DAC) definitions</p>	<p>How will income eligibility and disadvantaged communities be determined?</p>	<p>DOE’s IRA Home Energy Rebates Program Requirements and Appliance Rebates Instructions, includes the following definitions:</p> <ul style="list-style-type: none"> • Low-income household is a household below 80% AMI • Moderate-income household is a household between 80% and 150% AMI • A low-income multifamily building is a building with at least 50% of households with incomes less than 80% AMI (<80%) • Moderate-income multifamily building is a building with at least 50% of households with incomes less than 150% AMI (<150%) <p>NYSERDA’s partial-scope HEAR application proposes to use a definition for disadvantaged communities that is consistent with NYS’ existing DAC definition. The partial-scope HEAR application will follow the existing EmPower+ income eligibility process. NYSERDA will continue to assess options to expand the DAC incentives to include Justice 40 communities with stakeholders as we develop our full-scope implementation plans.</p>
<p>Outreach and Engagement</p>	<p>Clarify plans for consumer outreach and education (now and during IRA)</p>	<p>NYSERDA has had ongoing engagements with key stakeholders in the design and implementation of the Home Energy Rebate Program including the establishment of contractor and community partners working groups in the fall of 2023. NYSERDA is presently developing a draft Community Benefits Plan and an Outreach and</p>

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		Education Plan which will be shared with these working group members with an opportunity to provide feedback before finalization.
	Clarify plans for coordination/collaboration with others on design and implementation	Stakeholders are encouraged to join the quarterly Residential Market Advisory Group Meetings (RMAG) which will provide opportunities for information, discussion, and feedback to all residential sector stakeholders. Additionally, NYSERDA will collect IRA related stakeholder inquiries and feedback via email at residential.ira@nyserda.ny.gov
Program Implementation	What tools will aid the contractor and consumer in understanding program offers and incentives?	Once the final HER and HEAR program design is complete and approved by DOE, NYSERDA will develop and deliver training for contractors and other market participants.