



October 12, 2023

Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street, MS #39
Sacramento, CA 95814

Re: Aggregator Support for the HOMES Rebate Program Measured Savings Pathway

Dear Commissioner McAllister,

We are a collection of industry leaders that are currently investing or plan to invest in or enable the aggregation of home energy retrofits through a measured savings approach in California. We write to express our support for the Home Energy Performance-based, Whole-house (HOMES) Rebate Program and affirm that there is a thriving market of companies like us in California interested in participating as aggregators or otherwise enabling the measured savings approach.

Under the measured savings approach, the following market transformation outcomes (and more) are possible:

- **Private Capital Investment:** Aggregators like the undersigned will provide or finance upfront incentives and invest in the outreach, education, and financing of home energy retrofits while supporting the growth of local contractors.
- **Reduced Administrative Burden:** Contractors, homeowners, and program administrators may see program administration costs significantly reduced given the flexibility inherent to the measured savings approach.
- **Consumer Protection:** The market actors (aggregators and contractors) are aligned with the homeowner in having a direct financial incentive to achieve estimated energy savings, making it more likely that comprehensive, high quality projects will be installed.
- **Public Dollar Accountability:** State energy offices and other program administrators will be guaranteed to only pay out rebates based on realized energy/carbon savings, public dollars for public goods.

Aggregators perform the following services to reach these market transformation outcomes:

- Provide upfront capital to contractors and homeowners based on the expected value of measured savings rebates.
- Assume 100% of the energy savings performance risk - if projects don't save energy, aggregators don't get paid (but contractors and homeowners still do).

- Invest in other value add services like lead generation, homeowner education, and financing.

The intent of the measured savings approach is to create a market for measured energy savings, providing aggregators flexibility to deploy different energy-saving and greenhouse gas reduction strategies as well as market-based competition that will encourage homeowners to undertake the energy efficiency upgrades.

Because much of program administration is focused on ensuring accurate energy savings, and because the burden of program design is on the aggregator to achieve the desired energy savings, the measured approach dramatically reduces overall program administrative costs and aligns the incentives where they should be, on achieving energy and carbon savings.

In closing, we support the HOMES measured savings approach in California as an opportunity to provide flexibility and encourage innovation to pursue the highest energy-savings impact measures, using real-world tested methodologies and metrics to provide delivered savings. We look forward to the opportunity to support and participate in California's rebate program.

Sincerely,

Sealed
OhmConnect
Recurve
UtilityAPI
Shifted Energy
Upfront Energy
LED GreenLight International
QuitCarbon
Greener N.O.I.
Peak Energy Solutions
Generac Power Systems
Leap
Harvest Thermal
SkyCool Systems
Net Zero Energy Operators
Home Healing Renovations, Inc.
Clean Tech Lighting and Power
Rincon Plumbing, Inc.
Northern Pacific Power Systems
Southland Heating and Air
Bee Right There Heating & Air
TriCounty Aire, DBA TriCounty Services
Michael Little HERS Rating

Energy Pool
Arcadia
PosiGen
Baker Home Energy
Franklin Energy
Perl Street
Transform SR Brands Management LLC (Kenmore and DieHard)
Eli Technologies
Quilt
NEIF
Primary Productions
Derapi
Copper Labs
Daikin
Uplight
New Mill Energy