



May 24, 2023

Secretary Jennifer Granholm  
U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585  
[The.Secretary@hq.doe.gov](mailto:The.Secretary@hq.doe.gov)

**Re: Aggregators Support the HOMES Rebate Program Measured Savings Approach**

Dear Secretary Granholm,

We are a collection of industry leaders that are currently investing or plan to invest in or support the aggregation of home energy retrofits through a measured savings approach. 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 interested in participating in the measured savings approach as aggregators.

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.

We make the following recommendations to DOE for the HOMES measured savings approach that we believe will help to ensure the success of the measured savings approach and encourage innovation and support a growing market for performance-based energy markets:

1. **Aggregator Definition** – We support a definition of aggregator consistent with the legislative text of the original HOPE for HOMES Act of 2021 (S.1760 and H.R.3456) that was the basis of the statute: the term ‘aggregator’ means a commercial, nonprofit, or government entity that may receive rebates provided under a State program under this Act for one or more portfolios, consisting of one or more energy efficiency retrofits. This inclusive definition should be paired with guidelines that will enable a competitive marketplace to participate in the rebate program, promote further market expansion, and consumer choice. We, the undersigned current and future aggregators and aggregator allies, represent an existing market ready to engage in the HOMES rebates.
2. **Standardization & Transparency** – The statute requires the use of “open-source advanced measurement and verification software, as approved by the Secretary.” Standardized and transparent measurement protocols will enable a consistent market across the country and reduce costs for states and aggregators. Just like a kWh, yard, or gallon of gas, we need standard transparent, open-source math for measuring the results of the measured approach. DOE should approve open-source advanced measurement & verification tools that are in use already so that we can incorporate and innovate with certainty.
3. **Flexibility** – The HOMES measured savings approach should provide appropriate flexibility to support innovation in a competitive marketplace, including explicit guidelines that enable aggregators to source energy data from credible sources. The purpose of the measured approach is to allow market-based solutions to energy savings. This innovation was the congressional intent—to not prescribe the approach but allow the market to incentivize the savings, paying only for those verified savings. It is critical that the market have the flexibility to incorporate technology, data, and program innovation which is sure to emerge as a result of these rebates.

In closing, we support the HOMES measured savings approach 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 participate as aggregators in the rebate program.

Sincerely,

Arcadia  
Archon Energy Solutions  
Baker Electric Home Energy  
Bee Right There Heating & Air  
BlocPower  
Buildings IOT  
CH Energy Solutions  
Clean Tech Lighting and Power  
CoolSys Energy Solutions  
Copper Labs  
Daikin U.S. Corporation  
David Energy  
Elephant Energy  
Elevation Home Energy Solutions  
Eli Technologies, Inc.  
Energy Incentives, Inc.  
Energy Pool  
Energy Solutions  
Energy Wise America  
Enspi Technologies, Inc.  
Epos Lighting Solutions  
Expost.io  
Franklin Energy  
Frigitek Services  
Future Power Corporation DBA Energy Conservation Options  
Gemini Energy Solutions  
Generac  
Green Rebates  
Greener N.O.I.  
GridPoint  
Halco  
Hartford Steam Boiler (HSB)  
Harvest Thermal, Inc.  
Highland Air LLC  
Home Healing Renovations, Inc.  
HomeWorks Energy  
IoEnergy, Inc.  
Kenmore and Brands  
Lightning Incentives

Logical Buildings  
Lovelight Solutions  
Michael Little HERS Rating  
National Energy Improvement Fund  
Northern Pacific Power  
OhmConnect  
Pacific Aire  
Peak Energy Solutions  
Pearl Certification  
PosiGen  
Quilt  
Recurve  
Rincon Plumbing, Inc.  
Rouj Energy Analytics  
Sealed  
Seinergy  
Shifted Energy  
Sunrun  
Taper  
Tetra  
The Energy Alliance Association, TEAA  
Upfront Energy, Inc.  
UtilityAPI

CC     Henry McKoy  
       Kathleen Hogan  
       Michael Forrester  
       Chris Castro  
       Joan Glickman  
       Danielle Walker