

Category 1: Comprehensive Program Design

Company Characteristics

1. Name, contact information, company or organization that you represent.

Company Name: Recurve Analytics Inc.

Name: Carmen Best, Chief Policy Officer

Contact information: carmen@recurve.com, bd@recurve.com

2. An overview of your approach to equity, diversity, inclusion, and accessibility (DEIA).

Recurve is committed to building a team, product, and business that reflects the diverse world and communities we live in and serve. Recurve's program approach supports DEIA in several ways. Our FLEXmarket's standardized contracts lower barriers to entry for a wide range of service providers with varying customer engagement business models. Providers come from and cater to all types of communities and can specialize in serving particular customer segments. Recurve's analytics also supports tracking DEIA outcomes with metrics on depth and breadth of neighborhood outreach, program impacts on energy burden, delivery of customer benefits, and contractor performance.

3. As applicable, a short description and a link to programming that your company is contracted or has been contracted to implement for planning, administering, and/or field delivery of federal or state programs. Note which, if any, provides low- and moderate-income and affordable home energy upgrades, especially with and in disadvantaged communities.

FLEXmarket is Recurve's comprehensive platform solution for planning, administering, and delivering efficiency programs. FLEXmarket uses advanced analytics to assess opportunities and track and monitor outcomes using consistent, transparent, open-source advanced measurement and verification software with a full audit trail. Our field approach leverages a growing network of aggregators paid for the project value they deliver. Recurve has implemented FLEXmarket for counties, community choice aggregators, and utilities working with the residential sector. We provide two examples of active FLEXmarkets here with links to full program detail, and several more can be found on the [FLEXmarket webpage](#).

Tri-County Regional Energy Network (3C-REN):

[3C-REN's Single Family Residential Program](#) is powered by [Recurve's Demand FLEXmarket platform](#). This residential market utilizes transparent, open-source measurement and continual tracking of changes in pre- and post-intervention energy usage observed at the meter. It pays locally identified aggregators and contractors based on delivered impacts quantified at the gas and electric meter and offers significantly higher incentives for projects delivered in targeted communities. Projects delivered to customers identified as "hard to reach" or to customers living in "disadvantaged communities" receive incentives that are three to seven times the market rate. This county program is aligned with achieving local carbon goals and addressing equity and economic development objectives.

MCE's Residential Efficiency Market:

Recurve implements the [Residential Efficiency Market](#) on behalf of MCE, a Community Choice Aggregator serving Marin, Solano, Napa, and Contra Costa counties. MCE offers a 20% upfront payment to aggregators based on forecasted grid value for installed projects. The program is measure-agnostic; aggregators choose what to install, and Recurve calculates forecasted incentives upon project enrollment. MCE and Recurve provide co-branded marketing, customer talking points, and resources on financing.

Statewide TECH Clean California:

Beyond FLEXmarket, Recurve supports trade allies with embedded analytics to meet specific goals. For example, Recurve works with TECH Clean California, a program promoting residential heat pump space and water heating technology, with energy consumption analytics to target high-potential customers to maximize the effect of limited incentives and prevent increased energy burdens, particularly in disadvantaged communities. The program quantifies the customer bill and greenhouse gas (GHG) impacts of all heat pump installations to continually refine its design and gauge the potential effects of widespread electrification. The webinar [Using Advanced Targeting to Ensure that Electrification Reaches Those Who Will Benefit Most](#) provides detail on this approach.

Program Goals

4. How would you describe the goals of this program design? What kind of market transformation are you looking to achieve?

FLEXmarket's primary goal is to deliver high-quality and high-value projects to all participants by aligning aggregator incentives with delivered impacts, streamlining program implementation to reduce overhead, supporting diverse business models for customer service with measure-agnostic flexibility, and ensuring accountability with accessible tracking and monitoring feedback for all parties. In addition, FLEXmarket aims toward foundational market transformation through quantified value, aligned incentives, and visibility into the customer and grid benefits of high-performing buildings.

5. Does your program address a specific building type? If yes, which?

FLEXmarket can address manufactured or mobile homes, multifamily and single-family buildings.

6. Does your program target a particular income level? If yes, which? If not, what income levels can your program effectively reach?

The FLEXmarket model can serve any income level and has been deployed for market rate, moderate income-qualified, low income-qualified, and targeted geographic areas, like disadvantaged communities. With the open market access strategy, a wide range of providers, from large implementers to local businesses, can participate in reaching a broad and diverse customer base. In addition, Recurve's analytics can inform metrics like depth or breadth of neighborhood outreach, program impacts on energy burden, delivery of customer benefits, and contractor performance to ensure that administrators can systematically assess opportunities to reach income-qualified customers and customers in disadvantaged communities. Recurve works with service providers to implement solutions and track and monitor progress toward outreach goals.

7. Does your program design address HOMES, HEEHR, or both?

FLEXmarket program design is a good fit for HOMES implementation, and Recurve's analytic capabilities can also support HEEHR implementation. FLEXmarket utilizes both targeting analytics and embedded open-source measurement and verification to support aggregators, implementers, and program administrators to optimize program delivery and is foundational to implementing the HOMES program, measured or modeled. For a midstream HEEHR program design, targeting, tracking, and monitoring analytics will also provide valuable feedback.

8. If your program design addresses HOMES, are energy savings measured, modeled, or both?

FLEXmarket is well-aligned with a measured implementation of HOMES. Open-source advanced measurement and verification can and should be used in modeled and measured implementations to monitor and ensure program performance.

Measured Implementation: FLEXmarket uses *actual* energy consumption to quantify savings; aggregators are paid for the value of these delivered impacts on their portfolio of projects. Aggregators, implementers, and administrators can see impacts derived from the advanced open-source M&V software. The aggregator develops customer savings

estimates based on deemed estimates, past actuarial performance, or a predictive model. Aggregators are motivated to provide estimates as close to actual savings as possible because their payment depends on it, and delivering expected savings to customers will build market trust. It is also important to note that in a FLEXmarket program, the aggregator settles with the customer during project installation.

Modeled Implementation: Open source measurement and verification analytics could support a modeled incentive approach by validating or supporting future calibration of modeled estimates. Customers would see the modeled results as the basis of the incentive, but they may experience something very different on their actual bills. To protect against aggregators and contractors overestimating savings with no accountability,¹ analysis of actual impacts, using open source measurement and verification, can be run simultaneously to course correct over time or prepare for a future utilizing a measured implementation approach.

9. Does your program design promote any efficiency or electrification technology in particular? How will you determine which technologies are eligible for rebates?

The FLEXmarket program design is technology agnostic by design. We will work with the guidance provided by DOE and the state energy offices' preferences for technologies in their state. See the sections on "Eligible Measures" in the existing implementation plans.

Market Conditions

10. What market conditions are necessary for your program design to be successful? What policies are necessary? What relationships? (E.g., relationships with utilities, relationships with appliance manufacturers, building envelope technology manufacturers, data access policies, relationships with local and county governments, consumer access to internet, consumer access to big box retailers.) If these conditions are not available, how would a state create them?

Each state has unique conditions that will facilitate success. Opportunities will vary with no universal pre-conditions or blockers. The HOMES program, implemented with a market-based model, enables the evolution of policies and practices in four key areas:

- **Utilizing advanced metering infrastructure (AMI)** when and where it is available to optimize the delivery of demand-side strategies and support data-driven policy.
- **Quantifying impacts from demand-side resources at the meter.** The impacts of demand-side program interventions are best understood when analyzed with the actual changes in energy consumption at the meter. Hourly data can also allow programs to better align with time-dependent grid needs.
- **Aligning incentives and payments with performance.** Performance-based program models use actual changes in energy consumption as the basis of payment and help align incentives, and provide built-in accountability that public funds are focused on delivered impacts.
- **Demonstrating how demand-side resources contribute to the energy system** to validate future funding mechanisms. When quantified at the meter and incentivized based on performance build accountability, demand-side resources can be assessed as comparably low-cost resources in procurement processes.

While not prerequisites, these policies are important for building dependable, affordable, competitive, and transparent demand-side resources system in any state. States can use federal funds to pave the way for a market-based approach to managing demand-side resources, partnering with utilities, cooperatives, state agencies, and existing providers.

¹ In the [Advanced Home Upgrade Program](#) in California the modeled approach was validated with a measured evaluation in near-real time, even though payments were made on predictions. The embedded feedback approach revealed significant issues with the models compared to actual performance and substantial variation in outcomes between contractors, which allowed program implementors to learn and adjust their program to achieve better results. [Ex post evaluations from New York](#) revealed similar results, but were not available until roughly three years after program implementation.

11. How would building permits and inspections impact the program?

We will follow all state laws and requirements and adapt the program rules in partnership with administrator needs.

Implementation Proposal

12. Describe your vision for implementation in as much detail as possible. Include

- a. **A description of the program concept. Who pays whom, when, for doing what (including eligible measures, income strata/customer types, incentive strategies, certification of work completed, contractor training and management, quality assurance, recycling of existing appliances and equipment, and funding leverage)**

The FLEXmarket begins with a program administrator setting the rules, including eligibility, submission criteria, measurement, verification, payments, and more.² It may also involve identifying other funding sources from existing programs for individual projects.

The data infrastructure is established in partnership with the program administrator. It includes secure data pipelines for energy consumption data targeting parameters (if available), aggregator project data submission, and controlled, secure access to a tracking and monitoring dashboard.

Based on program rules, aggregators identify, engage with, and lead customers through the sales process for their projects. Aggregators are approved to participate based on criteria established by the program administrator and are on-boarded to learn program rules and criteria for project submission, including any cross-program criteria (like appliance recycling, etc.) Projects are reviewed upon submission to ensure adequate data and realistic savings estimates.

- b. **A description of the participant journey through the awareness, application, participation, and close out process (including money flows and options for stacking rebates and financing)**

Participant experience is tightly aligned with the aggregator's services and business model. Aggregators recruit customers, identify their needs, and devise projects accordingly, factoring in incentives for competitive pricing. Contractors execute the projects, and customers enjoy bill savings, comfort, and health benefits, while aggregators are paid quarterly for proven savings impacts per program rules.

- c. **A description of the roles and responsibilities of all parties involved in the process, including the responsibilities of the State Energy Office**

The State Energy Office's primary responsibility is to ensure the success of the programs for residents. They are also responsible for ensuring that funds flow from DOE to the state and results are reported back to DOE. States may vary in their implementation roles; they can elect to serve as the program administrator or hire a third party.

The entity serving as a program administrator is responsible for establishing and enforcing the program's rules. An implementer is responsible for executing and operationalizing the rules of the program. An advanced measurement and verification provider quantifies changes in energy consumption using open-source software to calculate savings, and other impacts of the program, to inform payments.

Aggregators are responsible for customer interactions and satisfaction with the projects they deliver. Customers are responsible for their portion of project costs settled with the aggregator; they also authorize using their consumption data to inform aggregator payment and for statewide results tracking.

² Our comprehensive "Program in a Box" is available upon request for a deeper dive into each program component.

d. A statement of the benefits and comparative advantages of this program concept (including grid impacts related to electrification, ability or inability to cover a state’s entire geography)

FLEXmarket is designed to add value to projects, drive deeper retrofits, and expand aggregator market reach without disrupting existing business models. Anchored in actual savings, FLEXmarket provides accountability for states while giving customers access to various vendors, including their local contractors. By paying for outcomes, FLEXmarket gives aggregators flexibility to devise solutions that match customer needs with delivered value to the energy system. Allowing for grid-aligned, time- and location-based performance payments is also a key policy innovation.

e. A description of any secondary market implications (e.g., reselling energy savings)

Depending on the jurisdiction, savings or GHG impacts could be a marketable resource. For example, they may qualify for credit in the Regional Greenhouse Gas Initiative (RGGI) or cap and trade markets. Eligibility depends on the market qualifications and rules, but states may be able to validate credit based on measured and auditable results.

Types of Implementation Partners

13. Types of partners, businesses or other entities will be necessary for program implementation (Do not specify a third-party name. NASEO may delete your entire submission if a specific third party name is included).

Entities needed for program implementation include but are not limited to:

- Administrator: Allocates IRA funds following the law
- Implementer: Orchestrates delivery, coordinates incentive payments, and determines eligibility.
- Open Source Advanced M&V Provider: Facilitates secure data acquisition and handling and provides consistent, transparent results accessible to market actors and compliant with program rules.
- Aggregators/Trade Allies/Contractors: Develop, deliver, and install projects or services to the customer, including marketing, sales support, collection of energy data, and incentive structuring.

Other

14. Any additional comments.

Using publicly available [open-source](#) methods and code enables consistency and transparency of measurement and verification and allows for a growing market of providers to contribute, create extensions, and host add-on functionalities that are available to all users. More information about open source principles can be found at the [Open Source Initiative](#).

DOE and other government entities have invested substantially in developing the [Open Source Advanced M&V](#) tool [OpenEEmeter](#) over the past several years. The OpenEEmeter is available to any party without restriction under an [Apache2 license](#). Using a non-proprietary code base helps prevent vendor lock-in and enables a transparent and collaborative development process.

RFP Language

15. Any RFP language that could be used to execute your program idea

Recurve offers proposed RFP language in our Category 2 response on the program elements.

Category 2: Program Elements

Company Characteristics

16. Name, contact information, company or organization that you represent.

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Name: Carmen Best, Chief Policy Officer

Contact information: carmen@recurve.com, bd@recurve.com

17. An overview of your approach to equity, diversity, inclusion, and accessibility (DEIA).

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18. As applicable, a short description and a link to programming that your company is contracted or has been contracted to implement for planning, administering, and/or field delivery of federal or state programs. Note which, if any, provides low- and moderate-income and affordable home energy upgrades, especially with and in disadvantaged communities.

Recurve uses its analytical capabilities to animate essential program elements to plan, administer, and deliver efficient programs. Our analytic tools help clients assess opportunities and track and monitor outcomes using consistent, transparent, open-source advanced measurement and verification software with a full audit trail. Our partners represent innovative program administrators, implementers, and aggregators who use data-driven analytics to drive positive outcomes and optimize program implementation. Recurve has supported program administrators and implementers in counties, community choice aggregators, utilities, and state agencies targeting the residential sector. In addition to our comprehensive program offering, [FLEXmarket](#), we highlight three programs where Recurve's analytical capacity was used to assess and optimize program delivery, especially in programs targeting disadvantaged communities.

Statewide TECH Clean California:

Recurve supports aggregators and implementers with embedded analytics to meet specific goals. For example, Recurve works with TECH Clean California, a program promoting residential heat pump space and water heating technology, with energy consumption analytics to target high-potential customers to maximize the effect of limited incentives and prevent increased energy burdens, particularly in disadvantaged communities. The program quantifies the customer bill and greenhouse gas (GHG) impacts of all heat pump installations to continually refine its design and gauge the potential effects of widespread electrification. The webinar [Using Advanced Targeting to Ensure that Electrification Reaches Those Who Will Benefit Most](#) provides detail on this approach.

Targeting Analysis of Four Weatherization / Home Performance Programs - ComEd

Demonstrating that targeting methods were predictive, Recurve conducted a blind, controlled experiment using data from four ComEd residential weatherization and home performance programs. The study results showed that by applying targeting parameters to historical customer data, it is possible to predict which customers will save the most energy and benefit from the program intervention. Using smart meter (AMI) or monthly traditional meter data, Recurve analyzes the usage characteristics of customers who saved the most from past program participants to identify and prioritize those future customers who are most likely to save from a specific energy efficiency program or intervention. With this information, it is possible to identify the customers in the population who are statistically

likely to have much better outcomes (or those who are likely to have poor outcomes and are better candidates for something else). Targeting the right customers can make programs more cost-effective by increasing savings and benefits and ensuring customers see real impacts on their energy use. For more information, see [Utilizing Smart Meter Data to Improve Program Cost Effectiveness and Customer Outcomes](#).

Residential Measured Pay for Performance

Recurve was the advanced open-source measurement and verification provider for a major utility offering a residential measured pay-for-performance program. In this role, Recurve provided consistent, transparent measurement and verification to the providers in the program, and [some providers](#) used the information to optimize the program over time.

Program Elements

19. Describe the program element that is important for State Energy Office consideration. Be as detailed as possible.

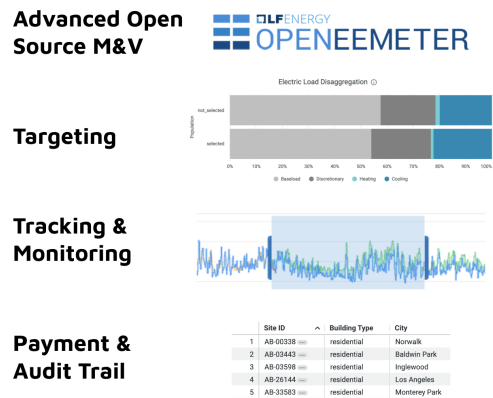
Recurve is prepared to support State Energy Offices with several core program elements essential for implementing HOMES and HEEHR following the legislation and pending DOE guidance. The elements are operationalizing advanced open-source measurement and verification, targeting customers for maximum impact, tracking and monitoring outcomes, and curating a payment and audit trail derived from thorough documentation of project interventions. Recurve is also positioned to support secure data management and controlled access functionality for the programs.

Operationalizing Open Source Advanced Measurement & Verification:

Recurve is experienced in establishing secure data flows to enable execution of all aspects of deploying an open-source advanced measurement and verification system within programs. The AM&V capabilities are essential for providing transparent quantification of performance incentives, tracking and monitoring projects and portfolios, and providing aggregators, implementers, and state energy offices with a comprehensive audit trail. Recurve is intimately familiar with the most widely used open-source advanced M&V method and codebase, the [OpenEEmeter](#). It has been integrated into all measured program implementation models and ex-post evaluations we have supported.

Program Optimization / Targeting: Targeting can ensure that SEOs channel limited funds to homes that will yield the largest energy and bill savings impacts. Targeting is a best practice and key element that should be used to optimize HOMES deployment to ensure the IRA funds can be most impactful. By prescreening and targeting individuals, program administrators can achieve greater results and avoid disadvantageous outcomes such as increased bills from electrification. Avoiding, or at least warning, customers that may experience potential bill increases due to electrification should be included as a protective program element in HEERA since rebates are solely available for LMI customers.³

Tracking and Monitoring: Any program implementation in HOMES and HEEHR will benefit from embedded tracking and monitoring capabilities using advanced M&V. They are essential for providing transparent quantification of performance incentives, supporting contractors in delivering quality projects, and ensuring customers get value. This program element provides valuable feedback to optimize performance over the life of the



³Meter-based Targeting For Beneficial Electrification at Scale, ACEEE Summer Study 2022 Proceedings

funding cycle and inform future funding streams by quantifying the direct customer and grid value of the portfolio for the state.

Comprehensive Audit Trail: Derived from the program implementation data, savings calculations, and incentive payment data for every project, Recurve maintains a comprehensive audit trail for any program we support. This audit trail has been used to support ex-post evaluations and can inform regulatory or federal audits of program spending.

Secure Data Management and Controlled Access: Recurve facilitates secure data transfer, protection, and controlled access. We can serve as a primary vendor to ensure data access and transfer responsibilities are strictly compliant with security protocols and assume liability grounded in state rules and regulations. Recurve has served as a secure bridge to manage data flow to aggregators from state agencies and worked with partners to secure customer authorization. Implementing a secure data access infrastructure will depend on the state's chosen program implementation model, state rules, and existing technical capabilities for enabling customer data access. Recurve has experience facilitating a wide range of compliant functionality to support the end goals of the program. We have passed security reviews at all major utilities and maintain SOC 2 compliance.

Other

20. Any additional comments.

The program elements described above are all included in the FLEXmarket program design outlined in our Category 1 response, "Comprehensive Program Design." Recurve can provide discrete program elements as part of another vendor's comprehensive program design or enable all or selected program elements in a FLEXmarket implementation model.

Using publicly available [open-source](#) methods and code enables consistency and transparency of measurement and verification and allows for a growing market of providers to contribute, create extensions, and host add-on functionalities that are available to all users. More information about open source principles can be found at the [Open Source Initiative](#).

DOE and other government entities have invested substantially in developing the [Open Source Advanced M&V](#) tool [OpenEEmeter](#) over the past several years. The OpenEEmeter is available to any party without restriction under an [Apache2 license](#). Using a non-proprietary code base helps prevent vendor lock-in and enables a transparent and collaborative development process.

RFP and Contract Language

21. Any RFP language that could be used to execute your program idea.

RFP Components: Vendor's response to an RFP should cover all of the following components for a Program Implementation Plan and a concurrent Measurement and Verification (M&V) plan. More detail on these categories is available in our comprehensive "Program in a Box" and available upon request.

Program Implementation Plan 1. Program Overview 1.1. Program Budget and Program Length 1.2. Layering and Stacking Funds 2. Program Eligibility 2.1. Aggregator Eligibility 2.2. Project Site Eligibility 2.3. Project Scope Eligibility	Measurement and Verification (M&V) Plan 1. Summary 2. Methods and Software 3. Savings Calculation 3.1. Baseline Model Creation 3.2. Generating the Counterfactual 3.3. Computing Unadjusted Savings 3.4. Comparison Group Alignment
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<p>3. Incentive Rates</p> <ul style="list-style-type: none"> 3.1. Standard Incentive Rate Calculation 3.2. LMI/DAC Incentive Rate Calculation 3.3. Hourly Incentive Rate Calculation <p>4. Program Process</p> <ul style="list-style-type: none"> 4.1. Pre-Enrollment Data Sufficiency and Eligibility Check 4.2. Enrollment 4.3. Approval 4.4. Payment Cadence 	<p>4. Anomalies or Non-Routine Events (NREs)</p> <ul style="list-style-type: none"> 4.1. Pre-Screen Customers for Eligibility 4.2. Quarterly Screening 4.3. Review 4.4. Adjustments <p>5. Data Collection and Handling</p> <ul style="list-style-type: none"> 5.1. Data Security 5.2. Data Collection
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RFP Definitions: Consistent definitions for the following terms should be included in an RFP to ensure consistency with the legislation and DOE guidance.

Advanced Measurement & Verification (AM&V): An enhanced version of measurement and verification (M&V) that can be applied to monthly, daily, and hourly energy usage data that takes advantage of advanced technologies, such as smart meters, sensors, and data analytics tools, to more accurately and efficiently measure, monitor, and verify energy savings.

Aggregator: An ‘aggregator’ is a commercial, nonprofit, or government entity that may receive rebates provided under the Inflation Reduction Act Home Energy Rebate Programs (HOMES and/or HEEHRA) for one or more portfolios, consisting of one or more energy efficiency retrofits, provided that that same entity does not receive administrative funds from the HOMES or HEEHRA programs from that same state or territory. Aggregators are responsible for marketing the program(s) to homeowners and/or contractors, submitting required program data (including homeowner energy data where necessary), project installation, and potentially providing other value-added services (lead generation, financing, etc.).

Certification Report: A formal document that verifies and validates the results of an energy efficiency project or program, typically prepared by a qualified third-party expert or organization. The certification report provides an in-depth analysis of the energy-saving measures implemented, the methodology used for measurement and verification (M&V), the energy and cost savings achieved, and the overall performance of the project or program.

Hourly Incentive Rate: A rebate structure recognizing the value of saving energy or reducing demand at specific hours or time periods.

Open Source Software: (OSS) is software distributed under a license that meets certain criteria requirements, including that it is made available in source code form (without charge or at cost) and that it may be modified and redistributed without additional permission. Other criteria may also apply to its use and redistribution or collaborative governance for development.⁴

Program Administrator (PA): The organization or agency responsible for overseeing and managing the energy efficiency program, including the development, design, implementation, and evaluation of the program. Program Administrators allocate resources, set program goals, and monitor progress, ensuring that the program delivers the desired energy savings and meets regulatory requirements. In the context of the Inflation Reduction Act (“IRA”) Home Energy Rebate programs, State Energy Offices will be the PAs unless they transfer this responsibility.

Program Implementer: A person, team, or organization responsible for executing an energy efficiency program or project, ensuring that the proposed energy-saving measures are installed, operated, and maintained correctly. Implementers may include energy service companies, contractors, consultants, or other professionals with expertise in energy efficiency technologies and practices.

Technology-agnostic: Refers to software that is interoperable among various systems and does not require specific technologies to be operable.

⁴ [Open Source Initiative](#) and [DOE Definition of Open Source](#)

Category 3: Indication of Vendor Interest

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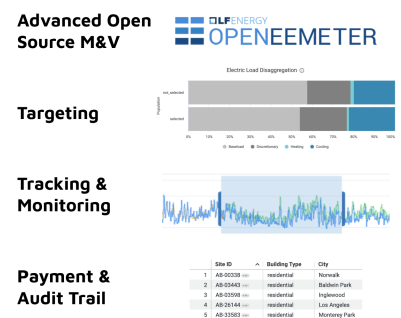
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Recurve can provide comprehensive programming or offer discrete analytic services to in partnership with other market providers to enable core program elements to optimize delivery and comply with requirements.

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Company Summary

25. Summarize the services your company or organization could provide to a State Energy Office in the execution of these programs.

Recurve Analytics, Inc. ("Recurve") provides revenue-grade meter-level analytics and advanced open-source M&V to help utilities plan, procure, and deploy demand flexibility. We empower utility programs and market aggregators to develop and deliver innovative business models and technologies to utility customers.

The Recurve Platform and FLEXmarket enable demand flexibility and allow demand-side resources to contribute to larger DER and electrification strategies. The Recurve Platform replaces layers of administrative overhead, ambiguity, and guesswork with data-driven feedback loops. Most importantly, it provides the tools and timely, granular insights utilities need to manage demand-side resource portfolios and deliver cost-effective programs.

Recurve Analytics authorizes NASEO to publish and distribute this response to the NASEO RFI on its website and through other means to the states and general public. We have included no confidential or proprietary information in our response.

Respectfully Submitted,



Carmen Best
Chief Policy Officer
Recurve Analytics, Inc.
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