



May 19, 2023

National Association of State Energy Officials (NASEO)

Implementation Options for **HOMES** and **HEEHR** Rebate Programs

Prepared for

National Association of State Energy Officials
Maddie Koewler
1300 17th St N #1275,
Arlington, VA 22209

Prepared by

UtilityAPI
Mike Burke
1212 Broadway, 16th Floor
Oakland, CA 94612



1212 Broadway, 16th Floor
Oakland, CA 94612
<https://www.utilityapi.com>

Dear Ms. Maddie Koewler,

UtilityAPI is pleased to submit this response to the National Association of State Energy Officials's (NASEO's) Request for Information. As you work to support the State Energy Offices tasked with implementing the Home Energy Performance-Based Whole-House Rebate Program (HOMES Rebate Program) and the High-Efficiency Electric Home Rebate Program, we encourage you and supporting staff to keep this fact in mind: **data access is solved.**

Since the inception of the Green Button initiative by the Obama Administration in 2011, the energy industry has made impressive strides toward enabling both customer and third-party access to utility data. Across the country, numerous utilities have adopted either the Green Button Download My Data or Green Button Connect My Data standard, and companies like UtilityAPI have invested millions into building software that empowers customers to share access to their utility data. These early data infrastructure investments by utilities, private companies, and the federal government have been an enabling tool that has silently scaled measured-based clean energy resources like rooftop solar and energy storage across the country.

More importantly, in the context of NASEO and the implementation of the Inflation Reduction Act, these data infrastructure investments paved the way for the inclusion of the modeled and measured-based energy efficiency in the HOMES Rebate Program. The utility data that the rooftop solar and battery energy storage industries have relied on to design and install their systems — primarily historical energy usage data — is the same data that is needed to implement the HOMES Rebate Program. UtilityAPI provides this type of utility data to our customers across the country every day, and since our founding in 2014, we have provided this information millions of times to thousands of customers. As you and your colleagues review our RFI response and support the development of out-of-the-box program designs for State Energy Offices to implement, we trust that our deep experience, and exclusive focus on data access will help overcome any fears about keeping utility and energy data central to the program's implementation.

We have provided our response under the “Comprehensive Program Design” category, as data access could serve as a stand-alone program. However, this information could also easily be transposed to the “Program Elements” category for use in a broader future RFP. We encourage you to review and post in both categories as we believe data access is foundational to the success of these programs and will be required by all who consider moving forward.

Sincerely,

Mike Burke

UtilityAPI | Vice President of Sales & Strategic Partnerships; Mike@utilityapi.com

Contents

- Comprehensive Program Design** **4**
- Company Characteristics 4
- Program Goals 4
- Market Conditions 4
- Implementation Proposal 4
- Types of Implementation 5
- RFP Language 6
- Indication of Vendor Interest** **7**
- Company Characteristics 7
- Company Summary 7

1 | Comprehensive Program Design

Company Characteristics

Overview

UtilityAPI is a software company on a mission to fight climate change and accelerate an equitable clean energy transition. We accomplish this by providing the data access services that all types of companies — from cleantech providers to property managers — need to deploy, manage, and optimize for their clean energy solutions.

At the same time, we partner with utilities and government entities to help them improve their data access services for their customers and constituents and solve their data challenges with new innovative data infrastructure solutions. We believe utilities will continue to be the hub of the consumers' energy lives and, more importantly, will play a central role in helping them adopt clean energy. We also acknowledge that in certain jurisdictions, government entities seek to accelerate market innovation and research by centralizing certain types of utility and energy data. Our extensible data infrastructure solutions can help both types of entities more securely enable data sharing and achieve their goals.

UtilityAPI is also committed to building strong public and private partnerships. Our own development has been supported by two US Department of Energy grants to support the development of the technology we now offer to the market. This history of utilizing public funding to provide a service that benefits all and lowers the barriers for equitable clean energy adoption is at the heart of our service.

For this RFI, Mike Burke, UtilityAPI's Vice President of Sales and Strategic Partnerships, will be NASEO's main point of contact. His information is mike@utilityapi.com and 518-928-2288.

Diversity, Equity, Inclusion, and Accessibility Approach

As a mission-driven company we approach DEIA both internally and externally. Internally we are committed to building a team that reflects the diverse demographics of the American population. This includes diversity that could be observed, such as age, race, and gender, and diversity that cannot be told at face value, which includes educational background, disability, and religious upbringing, among many others. We go beyond most anti-discrimination statements, as we include socioeconomic status, weight, marital, and parental status in our hiring practices.

This internal commitment to DEIA has led to an internal team that is currently 45% women, 38% people of color, 16% LGBTQIA+, and 5% disabled. Also, because we are a fully remote software company, we are able to hire across 17 states and provide 25 people with their first jobs in the cleantech sector.

Externally, we are committed to ensuring the clean energy transition does not leave behind marginalized communities of color that have been historically overburdened by health-harming pollution and socioeconomically disenfranchised. Our CEO, Devin Hampton, co-founded the [Empowering Diverse Climate Talent \(EDICT\) program](#), a collective of over 70 climate tech companies that are committed to building stronger businesses through diversity. To date, EDICT has helped place over 300 people from diverse backgrounds at climate tech companies.

In addition to our company leadership's commitment to DEIA, UtilityAPI also provides in-kind and discounted services to businesses deploying clean energy in historically underserved communities. Since 2019, UtilityAPI has provided in-kind utility data access to Grid Alternatives – a company whose mission is to rapidly transition to a world powered by renewable energy that benefits everyone – helping them install solar panels on over 1,100 low-income households and over 4.4 MW of rooftop solar across their portfolio.

Portfolio Highlights

Across the United States and Canada, UtilityAPI has deployed our Utility Data Exchange Platform with utilities across North America, and we are currently deploying a statewide data access solution for the New York State Energy Research and Development Authority (NYSERDA). This extensible, scalable, and commercially available software platform enables the data access necessary to achieve clean energy goals, implement programs, and cultivate market innovation. Below are links to a sample of our US-Based platforms and partnerships:

- Consumers Energy, Michigan - <https://greenbutton.consumersenergy.com/>
- Fort Collins Utilities, Colorado - <https://data.fcgov.utilityapi.com/>
- National Grid - Upstate New York, New York - <https://www.nationalgridus.com/Upstate-NY-Home/More-Efficiency-Solutions/green-button-connection>
- Peninsula Clean Energy, California - <https://www.peninsulacleanenergy.com/data-connect/>
- Silicon Valley Clean Energy, California - <https://data.svcleanenergy.org/>
- Integrated Energy Data Resource (IEDR), New York - <https://www.nysesda.ny.gov/All-Programs/Integrated-Energy-Data-Resource-Program>

UtilityAPI is also used by over 2,000 clean energy service providers, property managers, and businesses across the country to obtain access to the data they need to serve their communities. We are proud to make the same powerful data access tools available to the largest names in our industry, as well as local, small businesses who make up a large portion of clean energy service providers. When enabled by a local jurisdiction, our Utility Data Exchange Platform has a strong track record of being used to make a difference in neighborhoods and city blocks.

Program Goals

The goal of our program design is simple: UtilityAPI wants to ensure State Energy Offices have the statewide data infrastructure necessary to enable all their constituents to participate in the HOMES Rebate Program, along with other Inflation Reduction Act's programs and financial incentives more broadly. To achieve this goal, we propose configuring and launching on a statewide and/or individual utility basis our Utility Data Exchange Platform.

Consisting of an external-facing and an internal-facing solution, the platform will provide State Energy Offices with all the aspects needed for implementing the data requirements of the HOMES Rebate Program. At a minimum, the external-facing solution will include:

- A registration and onboarding portal for participating aggregators, program implementers, and supporting third-parties;
- A customer consent, receipt, and data access authorization dashboard;

- A series of public-facing informational pages, including an aggregator and third-party directory, and technical documentation program documentation; and
- A data dashboard where aggregators, program implementers, and supporting third-parties can download customer utility and energy data, configure APIs, and modify user settings.

The platform will also include an internal-facing administrative solution that State Energy Offices and/or utilities can use to review, and approve aggregators and third party registrations, export customized program reports, and process aggregate data requests from program implementers.

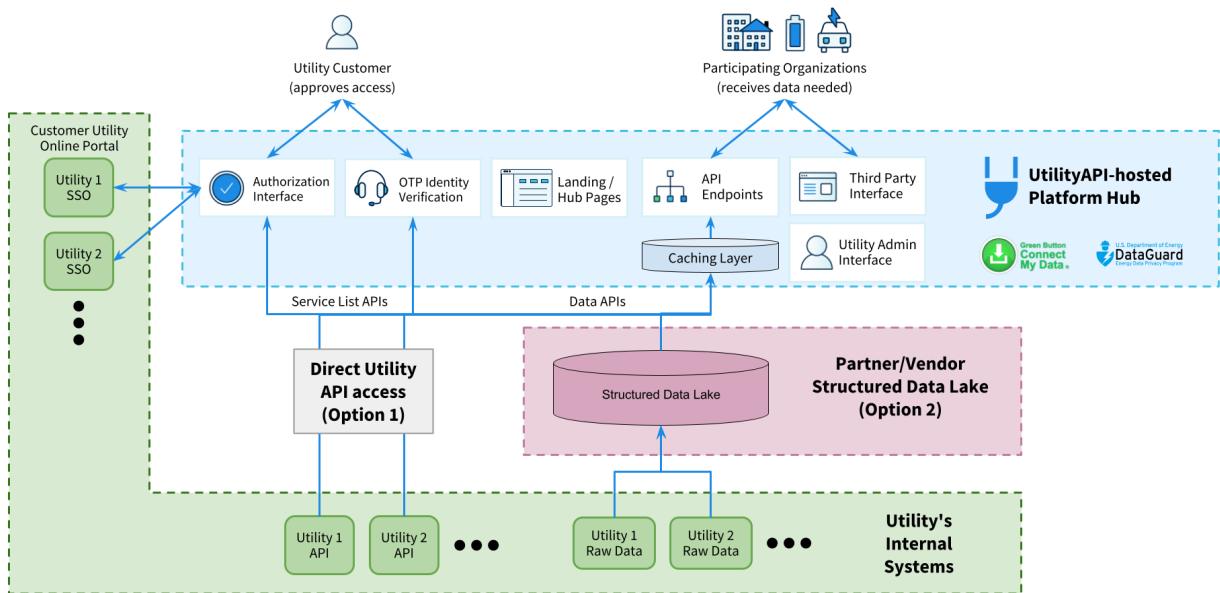
Our platform was built for the express purpose of enabling data-driven programs like the HOMES Rebate Program and data-driven clean energy deployment envisioned by the IRA. To ensure the platform’s success we will configure and deploy a unique platform for each State Energy Office, taking into account the state’s broader programmatic goals, and leveraging our experience launching utility level and/or statewide data platforms.

Market Conditions

Market Enabling Conditions and Platform Architecture

UtilityAPI's platform architecture is designed to be a highly adaptable and extensible solution that can integrate with a variety of back-end utility customer data sources to achieve a State Energy Offices’ goals. Figure 1 below provides a sampling of commonly considered implementation options — including utility APIs and data lakes — that offer State Energy Offices flexibility depending on their given market conditions, capabilities, and relationships with other key stakeholders.

Figure 1: High-level architecture diagram (Example options for statewide implementation)



It is important to note that the existing market conditions and technologies that are in place today (i.e. meter data management systems, customer information systems, etc.) are being used by every utility in the

country, are sufficient to implement our solution swiftly. We encourage State Energy Offices to engage with us in discussions about how to best leverage their state’s existing technologies and relationships to provide the most secure, efficient, and scalable platform design that meets their specific needs.

“Quick Start” Solutions

In states and circumstances when utilities are unable or unwilling to provide UtilityAPI, or a program implementer, with integration access to their backend, we propose leveraging a suite of “quick start” solutions that will empower the customer to share access to the data necessary for the HOMES Rebate program. These solutions will require customers to have an online account with the utility but are a bridge solution while discussions with utilities and potentially their regulators progress.

Implementation Proposal

UtilityAPI has a proven track record of successfully implementing a variety of platform solutions ranging from statewide platforms, individual utility platforms, and as a subcontractor to other keystone implementation vendors. UtilityAPI will work closely with each State Energy Office, to develop a detailed technical implementation plan and timeline to meet each state’s specific needs. Each plan will take into the state’s market and regulatory conditions, available vendor partnership opportunities, and the availability of our existing platforms. Given the page limitations in this proposal we welcome the opportunity to discuss details further.

Types of Implementation

As noted throughout our response there are a number of options available to State Energy Offices, program implementation vendors, and partner utilities. Figure 1 above includes commonly considered architecture options. UtilityAPI’s suite of solutions can be deployed through direct integration with each individual utility within a state, integrated with a centrally hosted state-wide data lake that is populated with utility data, and as noted above, also includes the option for “quick-start” solutions while more sustainable data integrations are developed over time. Our solutions can be commercially linked directly to the state, the individual utilities, or work under the umbrella of a core program implementation vendor that is selected.

RFP Language

We encourage each State Energy Offices to explore leveraging administrative funds to procure a statewide data access platform that will ensure that all their constituents have an opportunity to participate in the HOME Energy Rebate Programs. And that once implemented these same platforms can support IRA programs to come or future state level programs that require data access. We also want to highlight that our platform can be implemented in many different variations (i.e., statewide, utility by utility, etc.) while achieving the same goal and we encourage allowing respondents flexibility with their solution development. The important part is to ensure that the access is in place to actually allow these programs to achieve the scale and impact desired by the legislation.

Should the State Energy Offices seek to procure a statewide platform through direct commercial relationships as a stand-alone state-run solution, in partnership with the utilities, or as services to support core implementation vendors we suggest, at minimum the below requirements be included in your RFP language. Additional language details can be readily provided:

“Vendor is to provide, on a statewide basis, a readily-commercially available, certified Green Button Connect My Data (GBCMD) Consent Management and Data Sharing Platform. The platform will serve as the external user-facing interface that provides all of the aspects needed for implementing the data requirements of the HOMES Rebate Program, including:

- *Program implementers, aggregators, and third-parties registration and onboarding;*
- *Third-party APIs, dashboard, and settings interfaces;*
- *Customer consent, receipt, and authorization dashboard interfaces;*
- *Public-facing informational pages, including an aggregator and third-party directory, and technical documentation;*
- *An internal administrative interface for reviewing and approving aggregators and third-party registrant requests, processing aggregated data requests, and exporting reports;*
- *Ability to be certified to meet the requirements of the Green Button Standard;*
- *SOC2 Cybersecurity Compliance, as well as Department of Energy DataGuard Privacy Compliance.*
- *All data and supporting systems to be stored, hosted, and operated within the United States.*

3 | Indication of Vendor Interest

Company Characteristics

Contact Information

UtilityAPI

Mike Burke; Vice President, Sales & Strategic Partnerships

mike@utilityapi.com

(518) 928-2288

1212 Broadway, 16th Floor

Oakland, CA 94612

Diversity, Equity, Inclusion, and Accessibility Approach

As a mission-driven company we approach DEIA both internally and externally. Internally we are committed to building a team that reflects the diverse demographics of the American population. This includes diversity that could be observed, such as age, race, and gender, and diversity that cannot be told at face value, which includes educational background, disability, and religious upbringing, among many others. We go beyond most anti-discrimination statements, as we include socioeconomic status, weight, marital, and parental status in our hiring practices.

This internal commitment to DEIA has led to an internal team that is currently 45% women, 38% people of color, 16% LGBTQIA+, and 5% disabled. Also, being a fully remote software company has enabled us to hire across 17 states and provide 25 people with their first jobs in the cleantech sector.

Externally we are committed to ensuring the clean energy transition does not leave behind marginalized communities of color that have been historically overburdened by health-harming pollution and socioeconomically disenfranchised. Our CEO, Devin Hampton, co-founded the [Empowering Diverse Climate Talent \(EDICT\) program](#), a collective of over 70 climate tech companies committed to building stronger businesses through diversity. To date, EDICT has helped place over 300 people from diverse backgrounds at climate tech companies.

In addition to our company leadership's commitment to DEIA, UtilityAPI also provides in-kind and discounted services to businesses deploying clean energy in historically underserved communities. Since 2019, UtilityAPI has provided in-kind utility data access to Grid Alternatives – a company on a mission to rapidly transition to a world powered by renewable energy that benefits everyone – helping them install solar panels on over 1,100 low-income households and over 4.4 MW of rooftop solar across their portfolio..

Portfolio Highlights

Across the United States and Canada, UtilityAPI has deployed our Utility Data Exchange Platform with utilities across North America, and we are currently deploying a statewide data access solution for the New York State Energy Research and Development Authority (NYSERDA). This extensible, scalable, and commercially available software platform enables the data access necessary to achieve clean energy goals, implement programs, and cultivate market innovation. Below are links to a sample of our US-Based platforms and partnerships:

- Consumers Energy, Michigan - <https://greenbutton.consumersenergy.com/>

- Fort Collins Utilities, Colorado - <https://data.fcgov.utilityapi.com/>
- National Grid - Upstate New York, New York - <https://www.nationalgridus.com/Upstate-NY-Home/More-Efficiency-Solutions/green-button-connection>
- Peninsula Clean Energy, California - <https://www.peninsulacleanenergy.com/data-connect/>
- Silicon Valley Clean Energy, California - <https://data.svcleanenergy.org/>
- Integrated Energy Data Resource (IEDR), New York - <https://www.nyserda.ny.gov/All-Programs/Integrated-Energy-Data-Resource-Program>

UtilityAPI is also used by over 2,000 clean energy service providers, property managers, and businesses across the country to obtain access to the data they need to serve their communities. We are proud to make the same powerful data access tools available to the largest names in our industry, as well as local, small businesses who make up a large portion of clean energy service providers. When enabled by a local jurisdiction, our Utility Data Exchange Platform has a strong track record of being used to make a difference in neighborhoods and city blocks.

Company Summary

Overview

UtilityAPI is a software company on a mission to fight climate change and accelerate an equitable clean energy transition. We accomplish this by providing the data access services that all types of companies – from cleantech providers to property managers – need to deploy, manage, and optimize for their clean energy solutions.

At the same time, we partner with utilities and government entities to help them improve their data access services for their customers and constituents and solve their data challenges with new innovative data infrastructure solutions. We believe utilities will continue to be the hub of the consumers’ energy lives and, more importantly, will play a central role in helping them adopt clean energy. We also acknowledge that in certain jurisdictions, government entities seek to accelerate market innovation and research by centralizing certain types of utility and energy data. Our extensible data infrastructure solutions can help both types of entities more securely enable data sharing and achieve their goals.

UtilityAPI is also committed to building strong public and private partnerships. Our own development has been supported by two US Department of Energy grants to support the development of the technology we now offer to the market. This history of utilizing public funding to provide a service that benefits all and lowers the barriers for equitable clean energy adoption is at the heart of our service.

Authorization to Publish:

UtilityAPI 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.



Devin Hampton; Chief Executive Officer, UtilityAPI