

#ASTEmpowers



Request for Information (RFI)

National Association of State Energy Officials (NASEO)

Implementation Options for Home Energy Performance-Based Whole-House Rebate Program (HOMES) and High-Efficiency Electric Home Rebate Program (HEEHR)

*Category 2: Program Elements &
Category 3: Indication of Vendor Interest*

May 19, 2023

Submitted To:



Maddie Koewler
National Association of State Energy Officials
1300 North 17th Street, Suite 1275
Arlington, VA 22209
Email: mkoewler@naseo.org

Submitted By:



Laura Freeman
contracts@alleghenyst.com
304.319.0044
Allegheny Science & Technology Corporation (AST)
125 Professional Place
Bridgeport, WV 26330

AST 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.

1 DISCLOSURE STATEMENT

Allegheny Science & Technology (AST) authorizes NASEO to publish and distribute this response to the NASEO RFI (Implementation Options for Home Energy Performance-Based Whole-House Rebate Program (HOMES) and High-Efficiency Electric Home Rebate Program (HEEHR)) on its website and through other means to the states and general public. We have included no confidential or proprietary information in our response.

Laura Freeman
Director of Contracts

2 CATEGORY 2: PROGRAM ELEMENTS

2.1 Company Characteristics

2.1.1 Corporate Information

Name	Laura Freeman, Director of Contracts
Contact Information	125 Professional Place, Bridgeport, WV 26330; 304.319.0044; contracts@alleghenyst.com
Company	Allegheny Science & Technology (AST)

2.1.2 Approach to Diversity, Equity, Inclusion and Accessibility (DEIA)

Both the Inflation Reduction Act (IRA) and the Bipartisan Infrastructure Law (BIL) emphasize the importance of investing in disadvantaged communities (DACs), both in energy investment (including rebate programs) and in energy workforce development. Allegheny Science & Technology (AST) offers in-depth and impactful capabilities in both Justice40 and Diversity, Equity, Inclusion, and Accessibility (DEIA) in program planning and execution. In support of State Energy Offices (SEO), AST will integrate DEIA into program delivery with tangible goals and objectives identified and tracked. AST will help identify, facilitate, and create programs in which DEIA occurs in both the delivery process and program operation and will be targeted in distressed, challenged and hard to reach populations served so all can participate in energy efficiency and carbon reduction.

As the Community Benefits management lead for the Appalachian Regional Clean Hydrogen Hub (ARCH2), AST has developed and implemented the DEIA and J40 strategies across the entire ARCH2 region (WV, OH, KY, and PA). These management approaches, plans, and metrics are being applied across all 15 ARCH2 projects to ensure compliance with federal requirements, hub goals, and community needs. AST's oversight of the DEIA program will ensure that each project: documents a formal plan; allocates dedicated funding and resources for activities; provides training to employees; develops inclusion groups; contracts with minority/woman/veteran-owned businesses and forms collaborative partnerships; diversifies recruiting strategies; and establishes SMART goals and objectives. Our goal is to strengthen the projects' DEIA investments and develop actionable solutions to advance equitable economic opportunities for traditionally marginalized groups throughout the region and within each project area, including energy and rural communities.

AST has also assisted multiple federal programs in these efforts. For example, AST supports the Tennessee Valley Authority's (TVA) Home Uplift to fund whole-building energy upgrades and retrofits for low-to-moderate income (LMI) residences. AST leads outreach efforts to accomplish TVA strategic goals, including workforce development pilots and connected community activities for LMI and other populations. AST has also helped TVA and partners raise over \$2.75 million in funding to leverage with TVA's Home Uplift-LMI dollars.

AST suggests using the US Department of Energy (DOE) Home Performance with ENERGY STAR (HPwES) Program sponsors operating LMI utility-based programs to encourage DEIA and leverage their funding to expand the reach and effectiveness of IRA rebates. There are approximately 15 existing weatherization-like LMI programs offered by HPwES Sponsors or programs with enhanced incentives for LMI households. While the HPwES program is sunsetting, the delivery channels and programs will continue, providing a strong existing network to bolster DEIA in hard-to-reach populations. AST staff has advocated for a much greater focus and level of support for HPwES Sponsors serving such populations and has promoted strategies for reaching LMI populations with DOE and industry stakeholders.

Through the DOE Home Energy Score (HES) program, AST supports partners in providing transparent energy information to homeowners, homebuyers, and renters across the country, facilitating consumer protection by conveying a home's estimated energy use, associated energy costs, and cost-effective recommendations for saving energy. The information provided by HES is particularly important to underserved and LMI communities who experience high energy burdens, spending a disproportionate amount of their income on paying their energy bills. Furthermore, HES data can be used by states to inform their rebate programs' outreach efforts by identifying homes with the greatest need for energy improvements in DACs.

2.1.3 Experience in Planning, Administering and Field Delivery of Federal / State Programs

AST staff have played key roles in developing new initiatives and leading program planning, including program design; development of implementation protocols and procedures; development of materials, templates, and partnership

agreements; stakeholder engagement, recruitment, onboarding, and account management; and strategic planning for a variety of programs focused on residential energy – many for LMI households. In this capacity, AST has supported the DOE Building Technologies Office's (BTO's) HES and HPwES programs, BTO's Building Energy Asset Score, BTO's Advanced Building Construction (ABC) Initiative, and the Solar Energy Technologies Office's (SETO) Solar America Cities/Communities initiative, among others. In addition to supporting over 35 DOE HPwES Sponsors, AST staff (in prior positions) built, launched, and ran an award winning statewide HPwES Star program during ARRA that offered financing and rebates. They recruited utilities and built a trade ally network from the ground up.

Relevant Program Links:

- Home Energy Score: www.homeenergyscore.gov
- HPwES: <https://www.energy.gov/eere/buildings/home-performance-energy-star>
- Building Energy Asset Score: <https://www.energy.gov/eere/buildings/building-energy-asset-score>
- ABC Initiative: <https://www.energy.gov/eere/buildings/advanced-building-construction-initiative>
- SETO Solar America Cities/Communities guidebook: <https://www.nrel.gov/docs/fy11osti/47692.pdf>
- TVA Home Uplift: <https://energyright.com/residential/home-uplift/>

AST staff have played a key role in the planning, operations, and management of DOE BTO's HES program since its pilot phase (2011) and program launch (2012). AST has assisted state and local governments, utilities, nonprofits, and the finance and real estate communities to integrate HES into their programs and products to enable transparency of energy information to homeowners/buyers/sellers/renters and to encourage uptake of energy efficient improvements. AST has worked with many state energy offices (SEO) exploring or implementing HES programs, including the Alabama Department of Economic Affairs, Arkansas Economic Development Commission, California Energy Commission, Colorado Energy Office, Connecticut Department of Energy and Environmental Protection, Massachusetts Department of Energy Resources, Missouri Department of Economic Development/Division of Energy, Oregon Department of Energy, New Hampshire Office of Energy and Planning, New York State Energy Research and Development Authority (NYSERDA), South Carolina Energy Office, and Utah Office of Energy Development. AST works with several HES partners implementing HES programs in LMI and DACs, including the City of Gainesville, FL, where HES provides energy use and cost transparency to the rental community along with minimum energy performance standards as part of a rental ordinance to reduce energy burdens and increase housing affordability; Community Energy Partners serving low-income communities in Portland, OR; Superior Watershed Partnership serving Michigan's Upper Peninsula; and Walker-Miller Energy Services serving senior and LMI communities in the Detroit metro area.

AST supports DOE BTO's HPwES existing homes program, a collaboration between DOE and EPA that includes over 35 utility and nonprofit sponsors along with over 1,300 home performance contractors. The HPwES program enables home energy efficiency upgrades to be completed by a qualified network of contractors. AST provides technical recruitment and other administrative support for sponsors and stakeholders such as utilities, industry partners, trade associations, and contractors. This includes assisting sponsors offering financing, identifying ways to attract outside capital for investment into energy efficient measures, and developing new relationships with lenders and other funders to leverage existing funding sources. AST also assists sponsors seeking to train and educate contractors. AST provides technical assistance and support to utility and state-based LMI energy efficiency programs. AST staff has significant affordable housing experience working with industry leading organizations such the US Department of Housing and Urban Development (HUD), US Department of Agriculture (USDA), government-sponsored enterprises, state housing finance agencies and many other stakeholders involved with energy efficiency serving LMI populations such as the Building Performance Institute (BPI), the Building Performance Association (BPA), NASEO, regional energy efficiency organizations (REEO), RESNET and many others.

AST leads technical communications and stakeholder engagement activities for the BTO ABC Initiative, an initiative to accelerate the speed and scale of building decarbonization through industrialized innovations in new buildings and retrofits. AST is tracking progress on recently funded ABC retrofit demonstrations to capture lessons learned and best practices for sharing with stakeholders.

Additionally, AST has supported DOE's State Energy Program (SEP), Energy Efficiency and Conservation Block Grant (EECBG) Program, and Weatherization Assistance Program (WAP). AST has provided comprehensive assistance to

SEP (which provides funding and technical assistance to states to improve energy security, promote and support state energy initiatives, and reduce energy costs to consumers). These activities included: program assessment and planning, state and Tribal energy office liaison for data gathering, data quality and identification of reporting best practices, funding tracking, and program metrics development and reporting for Congressional requests.

AST was also recently awarded a multi-year contract with NYSERDA to provide Residential Energy Services. Task support areas under this contract include technology and market data analysis, technical and outreach document development, building electrification technology and strategy development, tools and resource development for low-income communities, residential energy efficient building design, and decarbonization and electrification benefit analysis. AST staff have actively worked for with the NYSERDA HPwES program for over 9 years and have established relationships with several key staff members. In addition, staff has attended several Building Professional Association conferences in Saratoga Springs, New York.

Additionally, AST staff have worked with the National Council of State Housing Agencies (NCSHA) at DOE's direction to reach state housing finance agencies (HFA). Staff have specifically worked with the Kentucky Housing Corporation (KHC) and the Tennessee Housing Development Agency (THDA) and are currently working to leverage USDA, Federal Home Loan Bank system and other funding in support of the TVA Home Uplift Program. AST staff are currently supporting LMI-focused statewide revolving loan funds to be used in concert with IRA rebates. It is important that both LMI households have easy access to low-cost fixed rate financing to cover the difference between the total project cost and the amount rebates can cover so that consumers without upfront capital can proceed with projects. This will allow deeper energy retrofits or can pay for upgraded equipment.

2.2 Program Elements

AST recommends that SEOs consider the following potential scope of work elements in relation to HOMES and HEEHR program support:

- Program Management and Monitoring: Tracking activities, funding spent, stakeholders, milestones, and program impacts and metrics
- Outreach and Communications: Communications planning, collateral development (print and web), message development, public relations, media outreach
- Strategic Stakeholder Engagement and Partnership Development: Identification of partners, program integration and delivery support, maintaining relationships
- Rebate Process Planning and Strategy
- Impact Analysis: Metrics and effectiveness analysis of program delivery
- Program Implementation: Create programs that are easy for all partners to participate in. The programs need to be easy to implement, track and provide meaningful data but without creating an undue burden to contractors or consumers.

We also recommend that SEOs leverage existing programs and delivery channels to the extent possible to maximize efficiencies and impacts without inhibiting process or reducing effectiveness, connect to hard-to-reach populations, and stretch limited program funds across and within states and stakeholder groups. Examples are below.

- Strategically leverage other funding opportunities and existing delivery channels to maximize impact of the rebate programs and enhance their reach to underserved communities, address energy burden and promote DEIA
- Use the HPwES Sponsors and similar organizations to reach LMI populations and leverage IRA funding to deliver energy efficient improvements
- Leverage the work and partner with state HFAs as they have existing delivery channels and reach hard to serve LMI populations
- Provide technical assistance to states through intermediaries and implementation contractors
- Tap into and use affordable housing providers and other affordable housing stakeholders. These organizations have long-term experience developing and operating programs and represent a unique delivery channel for reaching relevant stakeholders.
- Maintain flexibility (aggregators). Take a broad approach to include HFAs, CDFIs, affordable housing

- Contract with providers to design and procure software for day-to-day program management, rebate processing, and modeling to demonstrate energy savings targets are met while also tracking carbon reduction. Software should be easy to use and operate for contractors, program implementers, and consumers (as applicable).
- Coordinate with utilities and PUCs/PSCs to integrate, where possible, and assist with program implementation.
- Create bonus awards to serve both distressed urban areas as well as rural communities that are often forgotten or are operationally hard to serve.
- Use RLF proceeds to create revolving loan funds and for other eligible uses. Several states could use RLF money for short term projects to defederalize funding and alleviate long-term reporting requirements that are onerous for SEOs. For example, there are states still reporting to DOE on ARRA funding
- Work with DOE, state finance cabinets, affordable housing providers and others to create a mechanism for income verification
- Use HES to inform state rebate programs' outreach efforts by identifying homes with the greatest need for energy improvements in DACs. Additionally, HES is a DOE-developed tool that estimates home energy use and energy savings associated with energy improvement measures and has the potential to play a key role in the delivery of IRA home energy rebates.

2.3 RFP and Contract Language

AST has capabilities in all facets of RFI and RFP development and management should SEOs need assistance. Our support includes:

- Requirements gathering and analysis, including mapping requirements to any federal requirements
- Background research
- RFI/RFP development
- Evaluation criteria development
- Market research and industry outreach, including pre-RFP workshop planning and outreach
- Merit review planning, logistics, and support
- Integration and program design enhancement based upon RFI and RFP responses
- Award negotiation
- Contract closeout support

3 CATEGORY 3: INDICATION OF VENDOR INTEREST

3.1 Company Characteristics

3.1.1 Corporate Information

Name	Laura Freeman, Director of Contracts
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Company	Allegheny Science & Technology (AST)

3.1.2 Approach to Diversity, Equity, Inclusion and Accessibility (DEIA)

Both the IRA and the BIL emphasize the importance of investing in DACs, both in energy investment (including rebate programs) and in energy workforce development. AST offers in-depth and impactful capabilities in both Justice40 and DEIA in program planning and execution.

As the Community Benefits management lead for the Appalachian Regional Clean Hydrogen Hub (ARCH2), AST has developed and implemented DEIA and J40 strategies across the ARCH2 region (WV, OH, KY, and PA). These management approaches, plans, and metrics are used across all projects to comply with federal requirements, hub goals, and community needs. AST's oversight will ensure that each project: develops a DEIA plan; allocates funding and resources for; provides employee training; develops inclusion groups; contracts and forms collaborative partnerships with minority-owned businesses; diversifies recruiting; and establishes SMART goals/objectives. Our goal is to strengthen DEIA investments and develop solutions to advance equitable economic opportunities for traditionally marginalized groups throughout the region and within each project area, including energy and rural communities.

AST assists multiple US DOE and federal programs in DEIA efforts. For example, AST supports TVA's Home Uplift to fund whole-building energy upgrades/retrofits for low-to-moderate income (LMI) homes. We led outreach including workforce development and connected community activities for LMI and other populations.

AST suggests using DOE Home Performance with ENERGY STAR (HPwES) Program sponsors operating LMI utility-based programs to encourage DEIA and leverage utility LMI funding with IRA rebates. AST helped TVA and partners raise \$2.75M+ to leverage with TVA Home Uplift LMI funds. There are ~15 LMI programs offered by HPwES Sponsors. While the HPwES program is sunsetting, the delivery channels and programs will continue, providing a strong existing network to bolster DEIA in hard-to-reach populations.

Through the DOE Home Energy Score (HES) program, AST supports partners in providing transparent energy information to homeowners, homebuyers, and renters, facilitating consumer understanding of home energy use, associated energy costs, and cost-effective recommendations for saving energy. HES information is critical to those with high energy burdens, spending a disproportionate amount of their income to pay energy bills. HES data can inform rebate program outreach efforts by identifying homes with the greatest need for energy improvements in DACs.

3.1.3 Experience in Planning, Administering and Field Delivery of Federal / State Programs

AST staff have stood up new programs and initiatives and led program planning (i.e., program design; implementation protocols and procedures; program materials/templates; partnership agreements; stakeholder engagement, recruitment, onboarding, and account management) and strategic planning for residential energy programs – many focused on LMI households. AST has done this for the DOE Building Technologies Office's (BTO's) HES program; BTO's HPwES program, BTO's Building Energy Asset Score, BTO's Advanced Building Construction (ABC) Initiative, the Solar Energy Technologies Office's (SETO) Solar America Cities/Communities initiative, among others.

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AST staff have played a key role in HES program planning, operations, and management since its inception in 2011. AST assists state and local governments, utilities, nonprofits, and the finance and real estate communities with

integrating HES to enable energy information transparency for homeowners/buyers/sellers/renters and to encourage uptake of energy efficient improvements. AST leads partner and program management support services, stakeholder engagement, and program planning and strategic advisory services. We helped develop HES' operational plan and partnership protocols and provide technical assistance to partners and stakeholders. Through HES, AST works with SEOs exploring/implementing HES programs as well as partners implementing programs in LMI and DACs.

AST supports DOE BTO's HPwES existing homes program to enable the completion of home energy efficiency upgrades by qualified contractors. AST provides technical recruitment and other support for sponsors and stakeholders (i.e., utilities, industry partners, trade associations, contractors). Staff assist sponsors offering financing, identifying ways to attract outside investment, and developing relationships with lenders/funders to leverage existing sources. AST assists sponsors seeking to train and educate contractors. AST provides technical assistance and support to utility and state-based LMI energy efficiency programs. AST staff have affordable housing experience with industry leading organizations such as HUD, USDA, government service entities, state HFAs and other stakeholders involved with energy efficiency serving LMI populations such as the Building Performance Institute (BPI), the Building Performance Association (BPA), NASEO, regional energy efficiency organizations (REEOs), RESNET and many others.

AST leads technical communications and stakeholder engagement for the BTO ABC Initiative which accelerates building decarbonization through industrialized innovations in new buildings and retrofits. AST tracks progress on recently funded retrofit demonstrations to capture lessons learned and best practices for sharing with stakeholders.

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AST holds a multi-year contract with NYSERDA for Residential Energy Services, including: technology/market data analysis and document development; building electrification technology/strategy development; decarbonization and electrification benefit analysis; tools/resource development for LMI; and residential energy efficient building design.

Through DOE, AST staff worked with the National Council of State Housing Agencies (NCSHA). Staff worked with the Kentucky Housing Corporation (KHC) and the Tennessee Housing Development Agency (THDA) and are currently working to leverage USDA, Federal Home Loan Bank system, and other funding in support of TVA's Home Uplift Program. AST currently supports LMI-focused statewide revolving loan funds to be used in concert with IRA rebates.

3.2 Company Summary

AST is experienced in providing technical and programmatic support for federal and state programs, including those funded through DOE. AST can provide relevant support to HOMES and HEEHR program implementation, including:

- Strategic Planning and Policy Support
- Rebate and Funding Program Design and Administration
- Acquisition Support: RFI/RFP and evaluation criteria development; application reviews and recommendations; post-award negotiation; contract closeout
- Program Operations/Management: Project monitoring, tracking, and reporting
- Communications/Outreach: Communications planning and outreach program design, collateral development and dissemination; website development and maintenance; meeting organization and facilitation
- Stakeholder Engagement and Management: Stakeholder identification; relationship- and partnership-building to meet SEO goals and objectives
- Technical Support including integrating workflow among awarded program implementers and others
- Impact Evaluation / Analysis including Community Benefits Analysis
- Revolving Loan Fund (RLF) and Energy Efficiency Financing Program Development
- LMI and DEIA Program Design and Partnership Development Support
- Integration with other federal funding programs with LMI targets: USDA, HUD, etc.
- Use of other BIL, IRA and DOE funding for energy efficiency in other areas beyond single family such as multifamily housing, EV, EECDBG, Schools
- Electrification Program Design: Midstream incentives strategy