

May 19, 2023

Maddie Koewler
Senior Program Manager
National Association of State Energy Officials
1300 North 17th Street, Suite 1275
Arlington, Virginia 22209
Via email to mkoewler@naseo.org

RE: NASEO Request for Information (RFI) – Implementation Options for Home Energy Performance-Based Whole-House Rebate Program

The Center for Sustainable Energy® (CSE; www.energycenter.org) is pleased to provide these comments to the National Association of State Energy Officials (NASEO) in response to the RFI regarding Implementation Options for Home Energy Performance-Based Whole-House Rebate Program.

CSE is a national nonprofit that accelerates adoption of clean transportation and distributed energy through effective and equitable program design and administration. CSE is transforming markets through software-enabled, data driven incentive program administration, forecasting and planning software, and unique data offerings derived from project data sets. CSE administers cutting-edge incentive programs valued at over \$4 billion for governments, utilities, and the private sector across the United States.

CSE provides these comments based on our experience designing, implementing, and evaluating statewide commercial and residential solar and storage incentive programs in California. CSE authorizes NASEO to publish and distribute this response to the NASEO RFI on its website and through other means to State Energy Offices and the general public. We have included no confidential or proprietary information in our response. CSE's responses to NASEO's question are discussed in detail in the attachment to this cover letter.

Sincerely,



Karen Glitman
Senior Director, Distributed Energy Resources
Center for Sustainable Energy®

**Center for Sustainable Energy Responses to
Category 3: Indication of Vendor Interest**

22. Company Characteristics

Company Name: Center for Sustainable Energy

Contact information: Karen Glitman, email: karen.glitman@energycenter.org

23. An overview of CSE's approach to equity, diversity, inclusion, and accessibility (DEIA).

CSE believes that our ability to advance our mission and vision is enhanced by organizational diversity, and a workforce that is treated fairly, trained at all levels for advancement, promoted on merit and guided by a diverse leadership team, as reflected by the diversity of our Board of Directors. Equity is core to CSE's vision, and this is evidenced in the programs we administer and our internal practices. To create an equitable and inclusive workplace, CSE continuously evaluates its diversity, equity, inclusion, and accessibility (DEIA) practices and identifies areas for improvement in the following:

- **Recruitment and Hiring:** CSE employs a diverse staff (57% identify as female, 44% identify as non-white) and has enhanced our recruitment to workers from underserved communities.
- **Vendor and Partner Diversity:** CSE has developed a procurement policy and best practices for considering Minority Business Enterprises when looking for outside sources for purchasing material or equipment and for professional services.
- **Staff Training and Education:** CSE highlights its work in disadvantaged and low-income communities and how these programs address energy and transportation inequities.
- **Pay and Promotion:** CSE evaluates pay and promotion practices to ensure staff are compensated and promoted equitably based solely on merit.
- **Retention:** CSE offers flexible schedules and provides paid parental leave for the birth, adoption, or fostering of a child. CSE provides each employee annually with 24 hours of training and professional development.

24. 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.

CSE is the lead Program Administrator for the Solar on Multifamily Affordable Housing (SOMAH) Program. The SOMAH Program provides financial incentives for solar energy photovoltaic systems that benefit low-income tenants and property owners for multifamily affordable housing throughout California. SOMAH's unique, community-based approach ensures long-term financial benefits for low-income households and property owners, helps accelerate the market for solar on multifamily housing and creates jobs in disadvantaged and low-income communities. CSE's role includes program management, application intake, budget management and regulatory engagement. CSE leads quarterly public forums to share important program updates and information with all SOMAH stakeholders, which

includes property owners, tenants, contractors, community-based organizations, job training organizations and job trainees.

More information about the SOMAH Program and CSE's involvement can be found at <https://calsomah.org/> and <https://www.cpuc.ca.gov/somah>.

CSE is the program administrator for the San Diego Solar Equity Program (SDSEP). SDSEP is designed to enable income-qualified homeowners who live within the City of San Diego to install rooftop solar and enjoy the benefits of clean energy and energy savings. CSE leads the program design, engages community stakeholders, developed and maintains the website, and provides income verification and application intake and processing.

More information about the SDSEP can be found at <https://sdsolarequity.org/>.

Since 2001, CSE has administered the Self-Generation Incentive Program (SGIP) for San Diego Gas & Electric (SDG&E), providing financial incentives for the installation of clean and efficient distributed generation and energy storage technologies. CSE has contributed to comprehensive program rule design, incentive design, program handbook development, application process development, and has created technical forms and online dashboards and tools, including the program statistics dashboard, that inform stakeholders about the program and associated technologies.

More information about SGIP can be found at <https://energycenter.org/program/self-generation-incentive-program> and <https://sgipsd.org/>.

CSE is the statewide program administrator for EV incentive programs in [California](#), [Connecticut](#), [Delaware](#), [Massachusetts](#), [New Jersey](#), [New York](#), [Oregon](#) and [Vermont](#) most of which include an increased incentive based on income or geography.

You can view all the programs CSE administers here: <https://energycenter.org/programs>.

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

CSE is a data-driven, software enabled, program administration non-profit organization. CSE provides research and analysis through data collected via surveys and focus groups to identify market barriers and potential solutions. CSE has deep expertise in partnering with community-based organizations to ensure programs are accessible to and benefit disadvantaged and low-income communities.

With more than \$4 billion of clean energy incentive program value under administration, CSE is deeply experienced in program design and administration including income verification and incentive processing.