



National Association of State Energy Officials

# **RFI – Implementation Options for Home Energy Performance-Based-Whole-House Program and High-Efficiency Home Rebate Program**

Friday, May 19, 2023

**Prepared by:** Deloitte Consulting LLP

**Ms. Maddie Koewler**  
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**RE: Deloitte's Response to NASEO Request for Information -qs Implementation Options for Home Energy Performance-Based-Whole-House Program and High-Efficiency Home Rebate Program**

Dear Ms. Koewler,

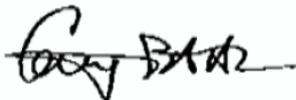
Deloitte Consulting LLP (Deloitte)<sup>1</sup> is pleased to submit our response to the National Association of State Energy Officials (NASEO) in response to the request for ideas for the implementation of the Home Energy Performance-Based Whole-House Rebate Program (HOMES) and the High-Efficiency Electric Home Rebate Program (HEEHR) programs.

In the following pages, you will read about our approach to delivering on key program requirements for the HOMES and HEEHR programs, our extensive experience in delivering solutions for programs with eligibility determination requirements, and other offerings curated for the needs of clients implementing these programs. Our solution centers around the customer, contractor, and building owner experience that builds upon our award-winning integrated eligibility solution.

*Deloitte Consulting LLP 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.*

Thank you for allowing us to share our solution, approach, and team with you. Should you have any additional questions, concerns, or comments regarding our response, please do not hesitate to contact me at [grahl@deloitte.com](mailto:grahl@deloitte.com) or (518) 556-8202.

Yours sincerely,



**Gary Rahl**  
Managing Director  
Deloitte Consulting LLP

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<sup>1</sup> As used in this document, "Deloitte" means Deloitte Consulting LLP, a subsidiary of Deloitte LLP. Please see [www.deloitte.com/us/about](http://www.deloitte.com/us/about) for a detailed description of the legal structure of Deloitte USA LLP, Deloitte LLP, and their respective subsidiaries. Certain services may not be available to attest clients under the rules and regulations of public accounting.

**CATEGORY 2: PROGRAM ELEMENTS**

**Company Characteristics**

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

Name: Jim Staley

Organization: Deloitte Consulting LLP

Type of Organization: Professional Services firm, for-profit

Phone Number: 617-438-8869

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17. An overview of your approach to equity, diversity, inclusion, and accessibility (DEIA). At Deloitte, [diversity, equity, and inclusion](#) are core to our values. From the moment our people walk in the door through each development opportunity, they are empowered to show up authentically, grow to their full potential, and live purposeful lives.

We recognize that each of us is multidimensional, with unique needs and expectations that emerge at different points in our personal and professional lives. Our inclusive culture empowers our people so they can connect to Deloitte’s values, feel like they belong in their practices, in their offices, and on their engagement teams, and have opportunities and support to develop strengths, grow with purpose, and own their careers. Diversity, Equity, Inclusion and Accessibility are foundational to our talent experience and who we are at Deloitte. To learn more about our progress and goals, visit our [DEI Transparency Report](#).

Our diversity, equity, and inclusion strategy is centered on three priority areas to enact greater change and deliver lasting impact:

**Diversity, Equity and Accessibility** – Diversity, Equity, and Accessibility guide how we approach our workforce strategy, and they also fuel and influence how we operate as a business. Our diversity and equity efforts are focused on creating a meaningful talent experience for all professionals, striving for a diverse, representative workforce, and promoting processes that provide access to opportunities for all our professionals.

**Inclusion and Belonging** - Inclusion is an inherent part of our purpose, our leadership, and our continuous efforts to develop the culture we want. That means creating and sustaining an environment in which people can be their authentic selves, feel like they belong, have courageous conversations, and develop genuine relationships that can last throughout their careers.

**External Impact** - We take seriously our responsibility to positively affect the communities in which we live and work. We work collaboratively with clients and other change-making organizations to address gaps in education and equitable employment opportunities and help create a more inclusive, prosperous, and sustainable future for our communities.

Sample of Deloitte’s DEIA Workforce Initiatives		
<u>VIRTUAL MENTORING PROGRAM</u>	<u>CAREER LAUNCH:</u>	<u>ENCORE PROGRAM:</u>
leverages the Strive for College UStrive online platform that connects our professionals with high school and college students to help them prepare for college, career, and a world of opportunity. To date, Deloitte professionals, and active and retired Partners/Principals/Managing Directors have mentored more than 7,500 students.	Deloitte started the Career Launch program with a major public university to assist first-generation and racially and ethnically diverse college business and STEM sophomores in learning and developing fundamental skills that can assist with academic and professional success.	Deloitte offers people who have transitioned out of the workforce for a period of time the opportunity to return to work for an engagement through our Encore program. This program provides training to help get them back up to speed and mentor’s help provide support.

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.

Deloitte, as the largest professional services provider in the world, provides access to unparalleled experience and global reach. This breadth and scale of our experience allows our teams to draw on the knowledge of 286,000 professionals to share leading practices and trends observed worldwide. Our experience spans the range of public and private sector industries. We have unparalleled expertise and experience, serving 47 out of the 50 U.S. States, and many national governments.

Deloitte has extensive experience in advising, implementing, and operating government programs on the State and Federal level for over 50+ years. Our range of experience, and our broad expertise across industries is unparalleled. Specifically, Deloitte has worked for 50+ years across 31+ states, serving 50 million+ residents delivering Integrated Eligibility (IE) systems. Similar to the affordable home energy programs, IE programs allow each state the capability to deliver a single platform experience for their residents to obtain needed social services including TANF (Temporary Assistance for Needy Families), SNAP (Supplemental Assistance Program), Medicaid, Child Care and LIHEAP (Low Income Home Energy Assistance Programs). With over \$100 billion in benefits distributed through these systems, Deloitte has extensive experience in designing, developing, and implementing government programs for disadvantaged communities. Deloitte leverages a number of Human Centered Design (HCD) methods to engage and co-create with disadvantaged communities among other key stakeholders.

### ***Michigan Worker Portal Project***

For the State of Michigan, Deloitte employed an HCD approach to redesign a module called Application Registration within the State of Michigan's Worker Portal that was originally designed over 15 years ago. The team engaged 10 participants in a series of user research sessions over the span of 2 days to understand pain and gain points and their journey. Deloitte also sent out a survey to close to 50 people besides the in-person research. The team then synthesized the research to develop new standardization requirements and lo-fi mockups that were validated through constant communication with users, SMEs, and other stakeholders until we developed a more polished hi-fidelity mockup.

### ***California's BenefitsCal Project***

BenefitsCal, California's integrated eligibility self-service portal, was developed with an HCD approach by focusing on user needs. The Deloitte team engaged a total of 33,160 individuals over 430 hours through surveys, focus groups, interviews, usability testing sessions, and design sessions. Insights from these interactions informed over 500 changes made to the design. Participants of different background and age groups across stakeholder groups were recruited for the research sprint to account for a holistic perspective to serve a variety of scenarios.

In response to the Covid-19 Pandemic, 10 states contracted Deloitte to extend their Integrated Eligibility systems to include ERAP (Emergency Rental Assistance Program) and HAF (Homeowners Assistance Fund). This allowed these states to leverage existing state capabilities to implement new federally funded programs, while also benefiting disadvantaged communities by avoiding duplicative application processes steps creating "application fatigue".

***District of Columbia***

Deloitte was engaged to help the District with the conceptualization, design, implementation and administration of the District's ERA program, Stay DC. Our role included review and interpretation of program guidelines issued by the Department of Treasury, facilitation of design workshops with District stakeholders, curation of functional requirements, development of business rules and technical requirements to drive the configuration of a program platform, setup of a contact center infrastructure, development of a case management process (including a payments and appeals process), public transparency via a program website, development program collateral (e.g., FAQs and user guides) to assist tenants and landlords, programmatic reporting to the Department of Treasury, and training of District stakeholders (including Community Based Organizations). Key solution components included a standalone Online Application for Tenants, Landlords, Community Partners, and Residents; an Application Inbox and Dashboard Functionality for participating ERAP users; and reporting capabilities.

***Department of State (DOS) Bureau of Energy Resources (ENR)***

Deloitte assists ENR in providing technical assistance and training to foreign government ministries and state-owned companies that manage critical energy infrastructure. ENR provides this assistance through two initiatives, the Energy Governance and Capacity Initiative (EGCI) and the Power Sector Program (PSP). ECGI supports frontier oil and gas producing nations design regulatory regimes based on leading international practices for exploration, production, development, and decommissioning activities of hydrocarbon assets. PSP focuses on improving the regulatory, planning, financial incentives, and market structures to support new power generation (renewable and thermal), transmission, and distribution assets. Both programs strive to develop the capacity of local government institutions and its staff to more effectively fulfill their mission as regulators.

Thus far, Deloitte has led 56 unique task orders in 33 countries throughout Latin America, Africa, Central Europe, Asia, and the Caribbean to stimulate private sector investment in new power generation and transmission capacity, improve grid resiliency, distribute generation project development, and increase financial access to emerging electricity and gas markets.

In conclusion, we believe that the broad experience and depth of knowledge we bring across the multitude of federal and state programs, requiring a breadth of capabilities, can be leveraged to facilitate the successful design, development, and implementation of IRA's affordable home energy programs. Furthermore, the nexus between each of the state's Integrated Eligibility programs and the home energy programs for disadvantaged communities brings an element of scale and efficient implementation.

**Program Elements**

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

In responding to Question 19, Deloitte is drawing on our unparalleled experience in delivering Integrated Eligibility (IE) systems throughout the United States, and extensions of IE that we have delivered to include ERAP (Emergency Rental Assistance Program) and HAF (Homeowners Assistance Fund) across 10 states during the Covid Pandemic. Deloitte has invaluable experience advising, implementing, and operating federally funded, state executed programs that require income eligibility determination and target disadvantaged communities.

Based on requirements laid out by the Inflation Reduction Act (IRA), one key challenge in implementing these programs is the need to verify consumer income when processing the rebates—our eligibility solutions can help states to tackle this challenge. Our solution will address the following requirements required in the IRA:

1. HOMES (Homeowners Managing Energy Savings) and HEEHR (High Efficiency Electric Home Rebate) programs include income eligibility requirements, which State Energy Offices will need to verify to determine eligibility. The HOMES program includes higher levels of reimbursement for Low- or Moderate-Income Households, which apply both to single- and multi-family dwellings. The HEEHRP similarly includes differentiated reimbursements, with further limitations in that only Low- or Moderate-Income households are eligible for the program.
2. HEEHRP includes an additional provision for processing at the point of sale. States must submit a plan to allow rebates for qualified projects at the point of sale, which will require capability to verify income eligibility and project eligibility.
3. Both programs require verification that only one rebate is received for each project type but that both programs can be leveraged if the homeowner is eligible. HOMES and HEEHRP require that no other Federal grants or rebates are received for the eligible project.

Deloitte's experience in Integrated Eligibility systems for public assistance programs can be leveraged to support State Energy Offices as they implement these systems. We are uniquely qualified to meet these requirements as a national leader in partnering with states to design, develop, and implement integrated eligibility and service delivery solutions for workers and customers. Our **award-winning integrated eligibility solutions** can be further built out to support eligibility verification across these rebate programs. We are creating an **Energy Efficiency Platform** (EEP) that builds upon our integrated eligibility solution to deliver a platform that would enable rapid access and efficient administration of these home energy efficiency rebate programs. Our solution suite can be customized in several ways to meet requirements and achieve mission goals. Our solution's key capabilities include:

1. Instant ability for homeowners, building owners, and residents to calculate their eligibility for the HOMES and HEEHR programs with minimal data entry.
2. Streamlined process for homeowners, building owners, and residents to apply for the programs securely.
3. Clear registration process for qualified contractors to benefit from the program.
4. Case management system so that state workers can review and approve homeowner, building owner, contractor information and securely store data.
5. User friendly customer experience for all user types (homeowners, building owners, contractors, state workers) with clear and timely notification system for application progress.

Our application is built with customer needs in mind, making the burden to apply as minimal as possible, allowing disadvantaged communities to leverage the program as intended. Our **Energy Efficiency Platform** offering suite is the best solution for customer experience and case management.

## CATEGORY 3: PROGRAM ELEMENTS

### Company Characteristics

22 – 24. Please see our response for Questions 17 and 18 above regarding our approach to DEIA and our qualifications.

### Company Summary

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

Deloitte offers a suite of services for State Energy Offices beyond an Energy Efficiency Platform for HOMES and HEERH programs optimized for customer experience and case management.

1. **State Strategy Definition**

- a. Determine State's eligibility for funding and equitable distribution across state for residents and contractors to participate
- b. Perform Gap Analysis against any existing home energy efficiency programs and determine best areas (geographic, residents, etc) to focus on
- c. Prepare documents for State Energy and Loan Program Offices to apply for grants

2. **Project Management Office**

- a. Work across various state agencies and stake holders to provide and aggregate project plans, goals, progress against goals, etc.

3. **Strategic Communications**

- a. Identify Low Income and Under-Served markets leveraging existing Deloitte assets such as PeoplePrism™, an analytic AI tool that uses US household information across thousands of demographic identifiers, to targeted populations for the HOMES and HEEHR programs
- b. Provide digital strategy and assets to advertise program and encourage participation from residents and contractors
- c. Support community understanding for eligible projects and the application process

4. **Customer Support/Call Center**

- a. Create Call Center and Support for residents and contractors to call and gather information about program
- b. Develop a centralized mechanism for contractors and residents to gather information and connect in how to take advantage in the program

5. **Contractor Outreach and Training**

- a. Conduct contractor outreach and training to build robust and highly trained workforce.

6. **Impact Monitoring**

- a. Support the monitoring process for pre and post home verification
- b. Measure and track benefits of energy savings for households and communities
- c. Determine impacts of new energy retrofits and if they meet modeled projections

7. **Technology Platform**

- a. Provide technical infrastructure to enable state to stand-up and implement efficient programs.
- b. Design and deliver world class UI/UX experience for residents and contractors to streamline applications
- c. Create back-end to efficiently validate, authorize, approve, and process energy savings and rebates.

## 8. **Surge Support**

- a. Process rebates 'behind the scenes' to support efficient scaling of operations