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May 19th, 2023

Maddie Koewler
NASEO
Submitted via email to: mkoewler@naseo.org

**Enervee Response to NASEO Request for Information (RFI)
Implementation Options for Home Energy Performance-Based Whole-House Rebate
Program and High-Efficiency Electric Home Rebate Program**

Dear Maddie

Enervee welcomes the opportunity to provide our Indication of Vendor Interest and share a Comprehensive Program Design for consideration by NASEO member states. These items are attached below.

Enervee hereby 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.

On behalf of Enervee, May 19, 2023

A handwritten signature in black ink, appearing to read "Anne Arquit Niederberger".

Anne Arquit Niederberger, PhD
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Attachments 1 (Comprehensive Program Design) and 2 (Indication of Vendor Interest)

Attachment 1 – Comprehensive Program Design (Category 1)

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

Anne Arquit Niederberger, PhD, SVP Market Development, Enervee
anne@enervee.com | 707-590-8660

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

As a company, we prioritize inclusion and equity, encourage diverse perspectives and experiences, and ensure that everyone across all identities is welcomed, respected, supported and valued. This applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

As a business, our focus is on driving equitable decarbonization, and we empower traditionally underserved individuals to purchase clean and efficient consumer products.

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.

Enervee partners with State Energy Offices to provide their residents with access to online marketplaces that integrate available incentives at the point of sale and allow consumers to finance their purchases. One example is the [NY Marketplace](#) program that Enervee is implementing in partnership with the New York State Energy Research and Development Authority. This program was designed from the ground up to better serve low- and moderate-income New Yorkers, with the following elements:

- Targeting disadvantaged communities (defined geographically)
- Integrating instant point-of-sale rebates and financing
- Inclusive Eco Financing allows income-constrained consumers to pay for clean and efficient products with affordable monthly payments
- Using the NY Marketplace as a new delivery channel for the EmPower+ low-income direct-install program, allowing participants to choose the no-cost product that best meets their needs and schedule installation online, along with haul-away and recycling
- Option for utility participation.

Further information is available [here](#).

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

The overarching goal of the proposed program design is to rapidly scale equitable decarbonization by eliminating friction in the implementation of IRA point-of-sale rebates, while also tackling other barriers that prevent low- and moderate-income consumers and disadvantaged communities from accessing clean and efficient technologies.

Our program design transforms consumer product markets by eliminating barriers that prevent people from buying clean and efficient electrical appliances, as documented in the [scientific literature](#) and [utility program evaluations](#) (further publications on request).

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

Our program serves all residential building types, as our focus is on helping any qualified consumer take advantage of HEEHR incentives when they make a purchase.

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

Our program can target the income level desired by an SEO for IRA rebates, while still serving all consumers. Enervee's marketplace is effective at driving better buying decisions without incentives (see response to Q4), while integrated point-of-sale rebates and optional Eco Financing can be targeted at and have proven particularly attractive to traditionally underserved customer segments, including people who lack access to affordable credit, low- and moderate income and renters ([this paper](#) reports on equity outcomes achieved even without specifically targeting income qualified consumers and without large rebates like those offered through HEEHR).

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

Enervee's focus is on the HEEHR program, but some of our existing utility partners are interested in using Enervee to provide services in the context of HOMES, as well, such as consumer lead generation and validation. We can readily work with states/ program administrators and HOMES program implementers to present state residents with an integrated experience for the two different consumer use cases (1-off retail purchase / HEEHR vs. contractor-led home retrofit / HOMES), as well to drive traffic to other relevant state and utility programs.

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

Not applicable, as our focus is on HEEHR. However, Enervee does quantify and can report the energy savings and carbon reductions from HEEHR point-of-sale rebates to ensure Justice40 goals are met. We already do this for existing utility and state point-of-sale electrification rebates, such as the \$3,100 TECH Clean California heat pump water heater electrification rebate.

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

For the HEEHR rebates, those are limited by the IRA to four categories – heat pump HVAC, heat pump water heaters, heat pump clothes dryers, electric cooking appliances – all of which our program includes and would target. In addition, from both an energy policy and consumer perspective, there is great value in SEOs rolling out comprehensive statewide marketplaces to offer all residents a 1-stop shop for energy-smart retail purchases.

Enervee's program offers 40+ energy-using and -control technologies (SEOs can decide which categories to feature), so consumers have access to incentives on other categories beyond those supported by HEEHR, and the platform is proven to drive more efficient purchases, even in categories without rebates.

Enervee's program relies on a daily-updated product catalog, and we programmatically identify those product models that meet qualification requirements established in the IRA, such as ENERGY STAR certification. This capability is core functionality for Enervee's existing partnerships with utilities. As a result, consumers, contractors and retailers do not need to deal with qualified product lists that can become outdated; instead, we automatically integrate the electrification rebate for eligible product models in the shopping cart (see example of California's TECH electrification incentive below).

The screenshot displays the Enervee website interface for a Rheem water heater. The main product card features a Rheem PROP50 T2 RH375-30 water heater with a '99' badge. It lists specifications: Volume: 45, Type: Hybrid/Electric Heat Pump, and Tank Height: 44.8. Financing options are shown as \$40.21/mo* for 60 months (with a \$4,999.00 cash price) or \$1,899.00. A sidebar on the right shows the Seller's Price at \$1,899.00, a TECH Incentive of -\$3,100.00, and a Professional Install fee of \$3,100.00. Below the product card, a loan payment summary shows a net payment after savings of -\$14.11/mo. The bottom right sidebar includes a warning that the item is not available in 97818 and a fulfillment note from a Water Heater Warehouse.

Where eligibility criteria for rebates and coupons are made available from states and/or utilities, Enervee's Eco Financing Pay solution can pre-qualify consumers for those rebates online in the purchase process and apply them at any contractor or retailer point of sale. This payment approach is preferred by leading retailers to a voucher approach.

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?

Enervee's solutions are truly turnkey, because we have been operating online marketplaces since 2015 and already have all of the necessary relationships in place (see response to Q13 for information on our partners). Our online marketplaces are accessible by smartphone, the predominant consumer interface, and people would be able to take

advantage of HEEHR rebates at the retailer or contractor point-of-sale of their choice with Eco Financing Pay (Enervee would work with these vendors to enable Eco Financing Pay as a payment type).

If a state wishes to rely on categorical income verification, we would need to establish modalities to tap into those databases.

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

a. Program concept



Enervee is offering SEOs a modular, integrated HEEHR program that offers four primary consumer entry points (indicated on the left side of the above diagram) and consists of the following core elements:

- [Enervee marketplace](#): A compelling online shopping experience that simplifies and streamlines the purchase and installation of electrification technologies with point-of-sale incentives from the IRA (and other sources), in partnership with retailers and contractors. Appliance recycling is integrated into the marketplace experience and can be offered at no cost and/or made mandatory with SEO support. Can be rolled out statewide and/or via utility partners.
- [Eco Financing Pay](#): Enervee's payment solution enables instant access to state and utility incentives for consumers purchasing at retail (big box, regional, local) or via contractors on-site at a home, offering advantages over voucher/coupon solutions and a frictionless experience for states, consumers, retailers and contractors.
- [Eco Financing](#): When rebates do not cover the full cost, consumers can finance the balance at the time of purchase.
- Targeted marketing: Enervee's digital marketing drives HEEHR participation and consumer engagement, complementing state and utility efforts.
- Rebate program implementation and reporting: Whether a state opts for a statewide marketplace and/or our Eco Financing Pay solution to support contractor/retailer participation in HEEHR, Enervee will identify products that meet utility, state and federal program rules; ensure consumer qualification in real-time across all connected programs; enforce consumer level limits and eligibility; report savings and other critical data as required to all connected entities; provide management of rebate programs, allowing consumers to see and benefit from cost savings at POS.

States can opt for all or a selection of the above components (not all combinations are possible). Enervee's solution can also seamlessly integrate of other state programs.

b. Participant journey

Refer to above diagram for an overview of the participant journey, which begins on a state or utility marketplace or at the contractor or retailer POS:

- Purchase via dedicated online marketplace: Participant shops for an eligible product (the Enervee marketplace experience for POS electrification incentives can be explored [here](#)). Once the participant is validated, all available incentives will be applied at checkout. The participant can bundle installation and recycling services and pay any balance net of rebates by credit/debit card or with monthly payments, if Eco Financing is available. Orders are fulfilled by Enervee partner retailers and contractors.
- With Eco Financing Pay, participants identify an eligible product via their preferred retailer or contractor. They pre-qualify via Enervee and can apply the HEEHR rebate when purchasing through a vendor that has enabled Eco Financing Pay as a payment type at their point-of-sale.

c. Roles and responsibilities

Generally speaking, the SEO will provide rebate funding, specify program requirements and ensure program oversight, while Enervee will implement a turnkey HEEHR program – from engaging consumers to deploying HEEHR-compliant point-of-sale rebates (in partnership with other market actors) and establishing data tracking and reporting systems. Either the SEO or DOE will provide a rebate clearinghouse to support double-dipping checks, compliance with rebate maxima, etc. Integration with utilities is desirable and can be led by Enervee.

d. Program benefits and comparative advantages

Core benefits of Enervee's solution suite are as follows:

- Consumers electrify with ease (superior user experience, blending of incentives and financing, available statewide) and benefit from offers across 40 categories
- Retailers and contractors receive full payment and margin at point-of-sale and can rely on Enervee for automated transaction-level validation and reporting
- Utility integration drives greater impact (EE/DR incentives, marketing)
- Reduce state overhead cost, drive retailer/contractor/utility participation, ensure program compliance and prevent fraud & abuse by using Enervee solutions as the "back office" for point-of-sale rebate administration.

13. Types of partners, businesses or other entities will be necessary for program implementation

Enervee offers SEOs turnkey solutions to drive participation in the HEEHR rebate program, be it Eco Financing Pay and/or a statewide online marketplace, which rely on existing relationships with manufacturers, retailers, contractors, lenders, green banks, utilities, and investors, to highlight some of the most important.

Attachment 2 – Expression of Vendor Interest (Category 3)

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

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

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- Option for utility participation.

Further information is available [here](#).

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

Within the scope of an IRA partnership to implement HEEHR rebates, Enervee can provide services including, but not limited to the following – all within a single, turnkey program that reduces friction for consumers, contractors, retailers, utilities, lenders, and SEOs:

- Digital marketing and consumer engagement to drive participation
- Support multiple consumer interfaces to enable and scale participation, including statewide marketplace, utility marketplace, retailer website, retailer brick & mortar store, contractor point of sale, and pre-qualification portal (making use of Enervee's payment solution, [Eco Financing Pay](#)).
- Host and manage online marketplaces for SEO and/or utilities. These marketplaces can serve all state residents, not only those who qualify for IRA rebates. Enervee's marketplace solution includes stacking of IRA, utility and other rebates and allows consumers to bundle installation, haul-away and recycling services.
- Ensure consumer qualification for IRA rebates in real-time across all connected programs, including verification of income qualification, using a suite of methods authorized by DOE/SEOs to cast the widest possible net.
- Automated identification of products that meet utility, state and federal program rules, taking advantage of Enervee's extensive, daily-updated product catalog of all products offered for sale on a given day. As a result, consumers do not have to figure out which products qualify and rebates are only issued for qualifying products.
- Perform double-dipping checks and enforce consumer-/dwelling-level rebate limits
- Digital IRA rebate program tracking and reporting, also on behalf of contractors and retailers that use Eco Financing Pay.
- Track and ensure achievement of Justice40 outcomes.
- Quantification and reporting of energy savings and greenhouse gas emissions reductions.
- Integration of [Eco Financing](#) to enable affordable monthly payments for any transaction balance net of any point-of-sale incentives.
- Outreach to utilities and integration of utility efficiency, electrification, demand response and/or low-income direct install functionality and incentives
- Cross-promotion of other state programs serving low- and moderate-income and disadvantaged communities. Marketplaces and related marketing are an effective, high-volume lead gen channel for other programs.
- Conduct participant surveys to gain insights and optimize the program.

Note that Enervee has extensive experience offering such services in the context of utility and State Energy Office programs.