



RFI RESPONSE

**National Association of State  
Energy Officials**  
1300 North 17th Street, Suite 1275  
Arlington, VA 22209

*Implementation Options for  
Home Energy Performance-Based  
Whole-Home Rebate Program  
and High-Efficiency Electric Home  
Rebate Program*

**MAY 19, 2023**







**SUBMITTED BY:**

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**Franklin Energy  
102 North Franklin Street  
Port Washington, WI 53074  
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**SUBMITTED TO:**

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**National Association of State Energy Officials  
1300 North 17th Street, Suite 1275  
Arlington, VA 22209**



May 19, 2023

National Association of State Energy Officials

1300 North 17<sup>th</sup> Street, Suite 1275

Arlington, VA 22209

RE: Franklin Energy's Transmittal in Response to NASEO's Request for Information – Implementation Options for Home Energy Performance-Based Whole-Home Rebate Program and High-Efficiency Electric Home Rebate Program

Dear NASEO RFI Response Reviewers,

Franklin Energy has been delivering turnkey energy efficiency and demand management programs across the U.S. for three decades. We have helped more than 100 utilities and government clients in 30-plus states design and administer programs reaching end-use customers of all types. We have focused heavily on the single-family and multi-family sectors over these many years, serving market-rate and low-to-moderate-income consumers living in urban, suburban, and rural communities. In any given year, we engage more than 500,000 households administering nearly \$100M in residential rebates.

For decades now, Franklin Energy, and other national firms like us, along with scores of smaller and more regional players have collectively built-up program delivery ecosystems – comprised of contractors, suppliers, community-based partners, and other market actors. The result has been program design approaches, best practices, and quality standards which have systematically led to successful home rebate programs in all 50 states. Franklin Energy and its partners are adaptable and capable of deploying individual programs that meet the needs of each jurisdiction we serve.

Franklin Energy appreciated the opportunity to respond to Category 1 and Category 3 questions outlined in the Implementation Options for Home Energy Performance-Based Whole-Home Rebate Program and High-Efficiency Electric Home Rebate Program Request for Information (RFI). We appreciate the time and effort NASEO is exercising in gathering market information and helping states prepare for these historic and critically important programs. *Franklin Energy's response includes no proprietary or confidential information, and it is suitable for public dissemination by NASEO.*

Sincerely,

A handwritten signature in black ink, appearing to read "Lloyd Kass".

Lloyd Kass  
Vice President, Strategy & Market Development

A handwritten signature in black ink, appearing to read "Alyssa Latuchie".

Alyssa Latuchie  
Director of Market Development for Federal and State Programs

## 1 Category 1: Comprehensive Program Design

### 1.1 Company Characteristics

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

Alyssa Latuchie, Director of Market Development for Federal and State Programs at [Franklin Energy](#), [alatuchie@franklinenergy.com](mailto:alatuchie@franklinenergy.com), 505-208-0254

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

Franklin Energy maintains supplier diversity industry best practices, led by Director of Diverse Sourcing and Inclusion Mark Sebree, an award-winning Business Inclusion practitioner. This effort is backed by a meaningful budget, documented policies and procedures, diverse spend goal setting, and thorough tracking and reporting. Franklin Energy engages in intentional vendor outreach and works closely with internal staff to ensure meaningful business development, partnership, and spend activity. Companywide, Franklin Energy is committed to increasing supplier diversity spend year over year.

Recently, Franklin Energy received the Edison Electric Institute (EEI) Prime Leadership Award for exemplary leadership in diverse supplier inclusion, outreach, and mentoring in our supply chain. Franklin Energy was also recognized in 2021 for our increasing commitment to WBE contracting opportunities and capacity building by the Great Lakes Women's Business Council, a nonprofit champion for women and minority businesses that provides access to capital, certification for women-owned businesses, corporate contracting opportunities, and small business educational support. To learn more about our approach, visit our website [here](#).

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.

With almost 30 years of experience, Franklin Energy recognizes the varied programmatic goals and utility structures of each state or territory. Our expertise in program implementation allows us to understand and meet the specific needs of different regions. Leveraging our extensive experience, we aim to provide states with a simplified and streamlined experience in implementing programs. Below, you will find a small sample of programs we have successfully implemented, offering insights into what HOMES and/or HEEHR programs may entail.

Since 2001, Franklin Energy has implemented programs for **Focus on Energy, Wisconsin's statewide energy efficiency effort** overseen by the Wisconsin Public Service Commission and funded by the state's investor-owned energy utilities and participating municipal and electric cooperative utilities. During the past two decades, Franklin Energy has implemented a wide variety of C&I programs for electric and gas savings. This work has included the Commercial Program (2001-2012), Business Incentive Program (2012-2019), Business and Industry Solutions (2020-present), and smaller programs and offerings including Rural Industrial, Midstream C&I Lighting, Small Business Program, Community Small Business Offering, Communications Providers, Midstream Commercial Kitchen Equipment Pilot, and Chain Stores and Franchises Program. This statewide work includes full implementation of the C&I program; customer marketing, education, and outreach; trade ally/contractor network development and nurturing; customer care center support; program application development; rebate application processing and rebate payments; and technical assistance. These program components are like those that will be implemented with both **HOMES** and **HEERH** programs. Our efforts have been recognized as part of Focus on Energy's overall success with five ENERGY STAR Sustained Excellence Awards.

Franklin Energy implemented the **Comfortable Homes Rebate Program for Pacific Gas & Electric in California** from 2019 to 2022. This program resulted in 2,500 whole home retrofits and is an example of what a **HOMES program** could look like using a **measured pathway**. Results demonstrated high savings realization rates and delivered significant peak electric savings, with program savings calculated using an industry-leading Advanced Measurement and Verification firm. Franklin Energy was able to use the data generated from measuring completed projects to calibrate prediction of subsequent ones. Find out more information about this program [here](#).

Franklin Energy has been a trusted partner of Energize Delaware since 2017, successfully implementing two whole home programs serving market rate and low-moderate income households, similar in nature to what a **HOMES program** could look like. Through these programs, Franklin Energy has grown and managed a large contractor network, offering valuable

solutions and support to ensure a skilled and efficient workforce. To date, these programs have disbursed incentives totaling over \$9 million, resulting in the completion of more than 4,500 successful projects. For further information on this impactful program, please visit our [website](#).

From 2012-2014, **Energize Indiana** was administered by Franklin Energy. This integrated statewide energy efficiency program was a collaboration of Duke Energy, Indianapolis Power & Light and 4 additional utilities, comprised of residential offerings (home energy audits, income-qualified weatherization, residential lighting), commercial and industrial prescriptive rebates, and school education, school audits components. We completed 168,000 energy audits, processed 9,500 rebates, mailed 200,500 energy efficiency kits, facilitated the point-of-sale purchase of 8.8 million light bulbs, distributed \$68 million in incentives and achieved 1,335,000,000 kWh in first-year energy savings. Best practices from the implementation of this program can be applied to both **HOMES** and **HEERH programs**.

Franklin Energy has implemented point-of-sale rebate programs, in a similar vein as the **HEEHR rebate program** will be on behalf of Entergy New Orleans and Entergy Louisiana since 2017 as part of a larger residential portfolio we also implement across the state. The program offers customers the opportunity to purchase ENERGY STAR products and appliances at participating retailers. This program leverages instant point-of-purchase rebates via a mobile-first tool designed for easy in-store use. Our team leads marketing efforts, creates point-of-sale materials, conducts outreach events, cross-promotes related programs, recruits and trains retailers, processes point-of-sale data, and pays retailer invoices. In all, we work with 175 retailers and 55 trade partners, 20 percent of which are diversified suppliers to achieve client goals of developing local infrastructure through meaningful investment in the local economy.

We recognize that each state has its own specific program needs and interests, and Franklin Energy currently operates more than 60 residential programs across 30 states. If you don't see an example of a program that aligns with your interests in the small sample listed above, please do not hesitate to get in touch with us. We likely have experience with a program like what you are seeking and can provide relevant examples to meet your needs. Feel free to reach out to us, and we'll be happy to explore the possibilities together.

## 1.2 Program Goals

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

Our primary program goals include creating seamless Energy Office and constituent experiences through a **locally-based team of experts**, proven rebate program delivery processes, and the state-of-the-art enabling technology to efficiently deliver large, complex programs. We are also driven to engage, empower, and oversee contractors to ensure programs grow the local economy while ensure a high quality of work. We prioritize equitable distribution of funds to address the energy burdens faced by low- and moderate-income households, while ensuring public investments are effectively utilized for measurable energy reductions and incentivizing high-quality energy retrofits. By stimulating demand for energy efficiency services and demonstrating transformative outcomes, we foster economic growth and sustainability, particularly in historically underserved areas. With nearly three decades of experience in program implementation, we offer state energy offices a simplified experience, allowing them to focus on their core objectives while we navigate the complexities of program delivery.

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

- ▶ Single-family homes. Franklin Energy currently implements over 60 programs through a network of over 1,300 contractors issuing \$82 million in rebates per year.
- ▶ Multifamily buildings. Franklin Energy currently implements 17 multifamily programs across programs. Collectively, our work the multifamily space has served more than 1 million households through direct building retrofits or rebates.

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

Franklin Energy's programmatic approach can reach all income levels, issuing rebates in accordance with any program's income eligibility requirements. On an annual basis, our residential programs result in more than \$100 million rebates, \$28 million of which have served low-income households.

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



Through our response in question 3, you can see that our flexible program design can address both HOMES and HEEHR.

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

Franklin Energy’s flexible program design can address both measured- and modeled- type programs, as can be seen in our response to question 3.

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

If a state wishes to promote any specific technology in efficiency or electrification, Franklin Energy can incorporate that into the specific program design and program configuration.

### 1.3 Market Conditions

Franklin Energy possesses extensive expertise in effectively implementing energy efficiency programs across diverse market conditions. Franklin Energy works in states and large metropolitan areas with aggressive energy efficiency policies and well-developed markets, leveraging the existing capacity to extend programs and close service gaps. Working in more than 30 states across the country, we are also quite familiar with rural states and areas and building capacity in communities with less experience in energy efficiency. Our longstanding national partnerships with utilities, suppliers, retailers, and contractors and our experience building local teams, community partnerships, and recruiting and developing contractors can be leveraged in multiple ways in varying markets.

### 1.4 Implementation Proposal

Here you will find a high-level overview of Franklin Energy’s implementation strategy. Please note that while these serve as starting blocks, we are dedicated to tailoring our approach to accommodate the unique needs of each state. Franklin Energy understands the importance of flexibility and adaptability in designing an implementation strategy that aligns seamlessly with your specific requirements. Franklin Energy’s overarching objective is to be a hub for stakeholders involved so that state energy offices can have 1 point of contact, leaving it to us to manage communication and coordination with the varied stakeholders.

Franklin Energy proposes that state energy offices first focus on their goals and vision for each of the programs and develop guidelines and minimum requirements they may want. From there, the energy office may choose to engage a consultant for program design and/or do so through a public stakeholder process, resulting in a program design and a Request for Proposals for a third-party implementer to launch and implement one or both programs.

Broadly speaking a third-party implementer such as Franklin Energy would be chosen to deliver the one or both programs. There are several efficiencies to be gained if state chooses a single implementer. It can be easier for energy offices, especially those with the fewest staff, to manage one contract with a single point of accountability. While the two programs can stand distinctly beside one another in the market, much of the back-office and administrative operations can be simplified and economized.

In an effort to respond to RFI questions 12 through 14 in an efficient manner given space constraints, we have developed the following matrix providing, followed by a Customer Journey depiction to provide overview of our comprehensive approach to program delivery:

PROGRAM COMPONENT	OBJECTIVES	TACTICS/CAPABILITIES	PARTNERS
<b>Outreach &amp; Education</b>	<i>Build community, contractor, and constituent awareness</i>	<ul style="list-style-type: none"> <li>▶ Market research, segmentation</li> <li>▶ Creative services, collateral development</li> <li>▶ Website, and social media resources</li> <li>▶ Multilingual outreach</li> </ul>	<ul style="list-style-type: none"> <li>▶ State agencies</li> <li>▶ Local government</li> <li>▶ Community-based organizations</li> <li>▶ Aggregators, contractors, retailers</li> <li>▶ Landlords (multifamily)</li> </ul>
<b>Participant Eligibility</b>	<i>Verify overall eligibility, direct households to HOMES, HEEHRA, and other programs</i>	<ul style="list-style-type: none"> <li>▶ Resident status, income eligibility processes</li> <li>▶ Savings modeling (for HOMES, e.g., 20%)</li> </ul>	<ul style="list-style-type: none"> <li>▶ State agencies (income, residence)</li> <li>▶ Utilities (energy use history)</li> </ul>
<b>Contractor/ Aggregator Engagement</b>	<i>Recruit, train, and support contractors and aggregators (for HOMES)</i>	<ul style="list-style-type: none"> <li>▶ Outreach events</li> <li>▶ Onboarding and training</li> <li>▶ Contractor portal</li> <li>▶ Ongoing support</li> </ul>	<ul style="list-style-type: none"> <li>▶ Trade associations</li> <li>▶ Distributors</li> <li>▶ Manufacturer/retailer contractor networks</li> </ul>

PROGRAM COMPONENT	OBJECTIVES	TACTICS/CAPABILITIES	PARTNERS
<b>Application and Point of Sale Rebate Processing</b>	<i>Expedited approval and processing of rebate payments to customers, contractors, retailers</i>	<ul style="list-style-type: none"> <li>▶ Online rebate tool with customers and contractor options</li> <li>▶ Point of sale coupons for retailers</li> <li>▶ Rebate status updates and notifications</li> <li>▶ Prompt/transparent flow of payments<sup>(a)</sup></li> <li>▶ Utility incentive and federal tax credit braiding/ stacking<sup>(b)</sup></li> </ul>	<ul style="list-style-type: none"> <li>▶ Aggregators</li> <li>▶ Contractors</li> <li>▶ Retailers</li> </ul>
<b>Customer Contact Center Services</b>	<i>Seamless, centralized customer experience and issue resolution</i>	<ul style="list-style-type: none"> <li>▶ Call Center (Multilingual)</li> <li>▶ Find-a-Contractor Tool</li> <li>▶ Appointment scheduling</li> <li>▶ Complaint, warranty support</li> </ul>	<ul style="list-style-type: none"> <li>▶ Aggregators</li> <li>▶ Contractors</li> <li>▶ Retailers</li> </ul>
<b>Quality Control/ Quality Assurance</b>	<i>Ensure quality workmanship, prevent fraud, and readiness for DOE program reviews</i>	<ul style="list-style-type: none"> <li>▶ Maintain overall program procedure manual</li> <li>▶ Verification of contractor licenses, insurance</li> <li>▶ Inspections, documentation review</li> </ul>	<ul style="list-style-type: none"> <li>▶ All stakeholders</li> </ul>
<b>Data Tracking &amp; Reporting</b>	<i>Consistent data collection and tracking with diligent data privacy protection</i>	<ul style="list-style-type: none"> <li>▶ Program tracking</li> <li>▶ Data security controls, threat detection, disaster recovery</li> <li>▶ Federal compliance reporting</li> <li>▶ Management improvement reporting</li> </ul>	<ul style="list-style-type: none"> <li>▶ Aggregators</li> <li>▶ Contractors</li> </ul>
<b>Partnerships<sup>(c)</sup></b>	<i>Bringing niche program features</i>	<ul style="list-style-type: none"> <li>▶ Energy auditing/modeling software (BPI 2400)</li> <li>▶ Project financing<sup>(d)</sup></li> <li>▶ Customer data acquisition</li> <li>▶ Home certification, energy score</li> <li>▶ Advanced measurement and verification (HOMES Measured pathway)</li> <li>▶ Workforce development and training</li> <li>▶ Diverse supplier focus</li> <li>▶ Retailer point-of-sale partnerships</li> </ul>	We have existing partnerships and/or historical relationships with specialists in each of these areas

### Chart Footnotes/Clarification of Approach

**(a) Flow of incentive payments:** This topic was called out in the RFI, so we wanted to make sure we addressed how the stakeholders will get funded in our proposal. Most frequently, customers will receive up-front incentives as a line item deduction on their contractor (or aggregator) invoice, or through merchant point-of-sale rebate. Contractors will be reimbursed by the aggregator (measured programs) or the implementer (modeled programs). Aggregators and implementers will receive funding through the program administrator (the state energy office, or designated authority). If you have questions or want to talk more about this, please reach out to us.

**(b) Braiding and stacking incentives:** This issue is front of mind for Franklin Energy and we are actively working on tools that will bring together incentives for customers regardless of where the funding is coming from. We know that constituent experience is front of mind for state energy offices, and we are creating tools to reduce confusion and increase the accessibility of all of the rebates that are available. For example, our program design will enable the routing of customers to either an energy office program, Weatherization Assistance, or utility program (or sometimes multiple) based on customer eligibility. And for our current programs, we will make households aware of the availability of tax credits as part of the customer experience.

**(c) Partnerships:** The final row above provides an indication of value-added partnerships we have utilized in the past and envision for the deployment of one or both of the IRA Home Rebate Programs. We will also prioritize the formation of local partnerships to ensure these programs are grounded in communities. And if an energy office has any additional preferred program features or types of partnerships, we will successfully integrate these into our approach. Lastly, if the state energy office prefers to carve out or use another third party to deploy any individual program component listed above, we can adapt program delivery accordingly.

**(d) Financing:** Financing is a critical component of any program where there is a customer out-of-pocket cost. Financing options can be provided at multiple levels: i) The state may have a program or partnership of its own; ii) we as implementers bring in partners to provide other statewide options; and iii) aggregators, contractors, and retailers may offer their own financing. We will make every effort to make sure these options for participants are clear and we will monitor the quality and customer service provided by lenders in the market.

### Customer Journey

We know that each program will be different in tactics used in order to achieve an individual state's unique goals, but the objectives will be consistent, and Franklin Energy has a wealth of experience to pull from to find the tactics that are right for your state and your constituents. While the backend of the program will vary, customer journeys should have a lot of similar characteristics. To visualize what this could look like, we have included the customer journey map below. [Figure 1.1](#) seeks to illustrate one version of the overall customer experience our approach can provide.

Please note, this is just one variation of a customer journey. A customer journey for HOMES will look different than a customer journey for HEERH. If a state wants to focus, for instance, on multifamily homes, or a specific measured or modeled program, these specifications will change the customer journey, and Franklin Energy has solutions for them all. Whether a state is interested in individual standalone programs or the whole portfolio of programs, Franklin Energy is prepared to fit your needs.

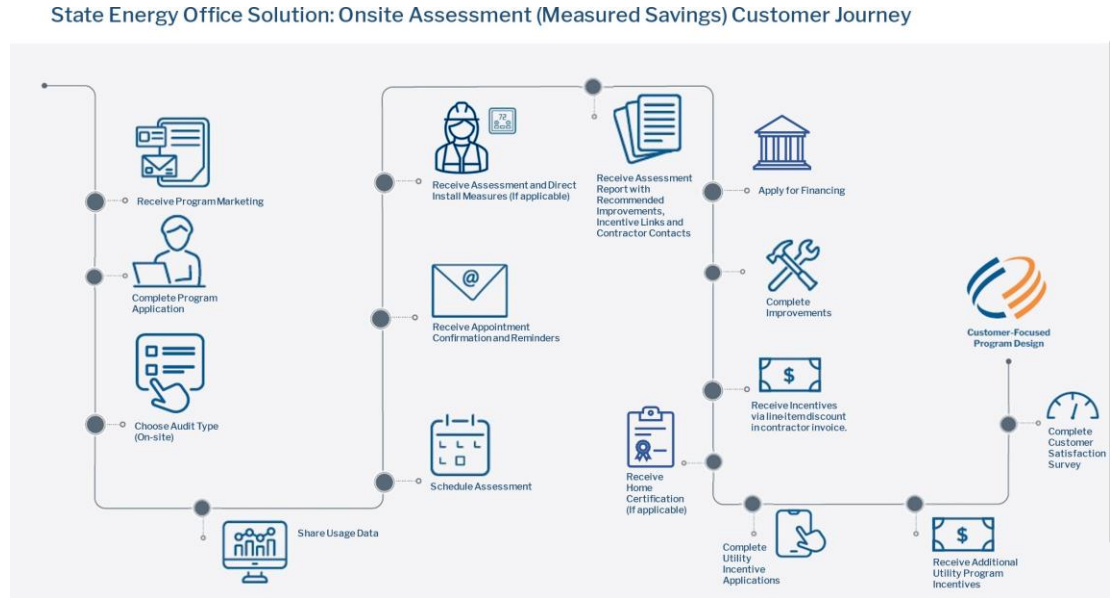


Figure 1.1. Customer Journey

If you are interested to hear more about what a program could look like in your state, Franklin Energy has developed a “Program-In-A-Box” resource with allies in the market that is available upon request for states. This resource will detail all program components and serve as a one-stop-shop for states who are interested in using industry best practices when creating their programs. States can leverage this invaluable resource to unlock the full potential of our offerings and provide their constituents with a seamless program experience.

## 1.5 Types of Implementation Partners

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

Implementation Partners can be found in the Overall Approach Matrix above in the Implementation Proposal section.

## 1.6 RFP Language

11. Any RFP language that could be used to execute your program idea.

Franklin Energy has a sample Request for Proposal (RFP) available. States are invited to utilize the RFP in its entirety or leverage specific components to align with their unique requirements. Although space constraints prevent us from sharing the RFP within this response, we invite you to reach out to us and we can send you a copy of an RFP that encompasses all program components outlined above. And if there are specifics that you want incorporated to meet your specific needs, do not hesitate to reach out to us and we can help.



## 2 Category 3: Indication of Vendor Interest (maximum of two pages) Company Characteristics

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

Alyssa Latuchie, Director of Market Development for Federal and State Programs at [Franklin Energy](#),  
[alatuchie@franklinenergy.com](mailto:alatuchie@franklinenergy.com), 505-208-0254

(Back up option: Lloyd Kass, VP Strategy & Market Development, [lkass@franklinenergy.com](mailto:lkass@franklinenergy.com), 646-522-4070)

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

See response to question 2 in category 1.

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.

See response to question 3 in category 1.

### 2.1 Company Summary

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

Franklin Energy delivers end-to-end sustainable energy management solutions through a portfolio of products and services that lower costs, reduce carbon waste, grow stronger communities, and boost local economies. Supporting our services is a highly respected executive team and more than 1,000 professional and technical experts with broad industry experience in design, engineering, marketing, outreach, education, customer service, and field services. Our work, grounded in decades of experience, has been recognized by professional organizations and proven to increase the visibility of our client's programs and promote their brands.

Our key areas of expertise include the following:

- ▶ **Programs.** We work with 150 utilities and state agencies to deliver over 500 energy efficiency and grid optimization programs in the residential, multifamily, small business, commercial, industrial, and agricultural market segments.
- ▶ **Platforms.** Our integrated online marketplace platforms are designed, developed, marketed, and fulfilled by an in-house team of experts in e-commerce and program marketing and logistics. We also offer a suite of customer engagement tools that seamlessly connects energy efficiency, demand response, and other distributed energy resources through automated participation paths tailored to customers' needs and interests.
- ▶ **Products.** We manufacture more than 375 core energy efficiency and water conservation products under the Niagara Conservation and Simply Conserve brand names. In addition, we have a long history of distributing large volumes of products on behalf of other manufacturers, such as smart thermostats and EV chargers. We've partnered with other distributors to simplify large-scale sourcing products like heat pumps and insulation.

Our record of performance extends to six key service areas:

- ▶ **Energy efficiency.** Our program and portfolio design, administration, and implementation experience include energy assessments, direct installation, prescriptive and custom incentive processing, and contractor management. We manage programs with a comprehensive and customizable technology suite that streamlines processes from field to fulfillment.
- ▶ **Load management, and grid flexibility programs.** We offer direct load control, home area networks, home energy management, programmable communicating thermostats, and load control switches is built on four decades of experience implementing load management and demand response programs.
- ▶ **Electric vehicles, charging, and make-ready services.** We provide EV education and enrollment, product fulfillment, installation support, and rebate processing, and make-ready services for residential and commercial customers.
- ▶ **Energy education.** We offer energy efficiency education for K-12 schools, direct-to-customer, and business programs. Our proven design provides the tools to form energy-literate households and businesses while generating

immediate verified savings in water and energy use.

- ▶ **Energy and water-saving products and kits.** We manufacture and distribute nearly 400 utility-grade energy efficiency and water conservation products, which are custom-engineered to provide superior performance and maximum savings at an accessible price point. Our products are used by utilities, municipalities, program implementers, contractors, and large corporations throughout North America.
- ▶ **Online stores.** Our online stores are designed, developed, marketed, and fulfilled by an in-house team of experts in e-commerce and utility program marketing and logistics.
- ▶ **Customer experience.** Our tools seamlessly connect energy efficiency, demand response, and other distributed energy resources through automated participation paths tailored to customers' needs and interests through dynamic portals, online audit tools, energy reports, gamification and rewards programs, online marketplaces, and more.

Our structure and scale offer comprehensive capabilities, support an integrated solution, and allow significant investment in innovation, greater resources, and deep expertise to meet your needs. Supporting our services is a highly respected executive team and more than 1,100 professional and technical experts with broad industry experience in design, engineering, marketing and outreach, education, customer service, and field services.

We have seen tremendous change during our decades in business. Through it all, we have remained the vanguard of the industry, anticipating change and evolving with it. We are constantly honing our expertise by listening closely to our clients and employees. That approach makes us the engaged partner our clients need to achieve program goals. We provide a turnkey, worry-free experience for our clients, marked by high customer satisfaction, solution-focused innovations, cost savings, and increased acquired savings. Our work has been recognized by professional organizations and is best evidenced by our long-term relationships with clients.



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