

May 19, 2023

National Association of State Energy Officials

Maddie Koewler, mkoewler@naseo.org

Re: NASEO Request for Information (RFI) – Implementation Options for Home Energy Performance-Based Whole-House Rebate Program and High-Efficiency Electric Home Rebate Program

On behalf of Schneider Electric, thank you for the opportunity to submit feedback on the Implementation Options for HOMES and HEEHR Programs as part of the Request for Information. The following comments represent the perspectives of Schneider Electric.

About Schneider Electric: Schneider Electric provides an array of energy management solutions (including products and services) globally to help our customers and partners create a more digitized, efficient, resilient, and decarbonized world. Schneider Electric is a 180+ year old company with roots extending from Europe to the United States with key acquisitions of US brands Square D and APC and innovation at every stage. Schneider Electric is now heavily invested in the United States and its own clean energy eco-system with an eye to growth, including new incubations and possibly new manufacturing to support energy transformation priorities and U.S. supply chain strategy. Schneider Electric has a major footprint in the United States with over 18,500 employees.

In response to the RFI, we have identified a few key areas of consideration.

Category 2: Program Elements (maximum of four pages)

Company Characteristics

1. Name, contact information, company or organization that you represent.
Jeannie Salo, Vice President of Government Relations – Schneider Electric North America – Jeannie.Salo@SE.com
2. An overview of your approach to equity, diversity, inclusion, and accessibility (DEIA).
At Schneider Electric, we embrace diversity as a strategic asset that fuels our creativity, innovation, and performance. We value the unique perspectives of our employees and understand that our success depends on reflecting diverse marketplaces and fostering a culture of inclusion. Our commitment to equity, diversity, inclusion, and accessibility is deeply ingrained in our company's DNA. We ensure that diversity is integrated at all stages of the employee experience, and we strive to create an environment where everyone's values are respected. By leveraging the power of our diverse workforce, we drive fairness, equality, and collaboration, that also DRIVES quality and innovation to allow us to make a lasting impact in the communities we serve.
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.

Program Elements

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

Understanding that the Homeowner Managing Energy Savings (HOMES) and the High-Efficiency Electric Home (HEEHRA) rebate programs leave room for performance- and point-of-sale-based compensation measures, we believe there are several key program elements necessary for successful and equitable implementation in each region of NASEO. Specifically, a successful program will accommodate a diverse portfolio of energy hardware that, when co-optimized, allows for cohesive interoperability, ease of access and setup, and a variety of contractors who can provide the installation service. We believe a successful implantation of HOMES and HEEHRA rebate programs measures the following elements:

- a. **Diversity of Eligible Hardware** – As home energy ecosystems of all levels, including LMI, continue to electrify across the USA, it is important that the definition of whole-house efficiency upgrades accommodates the variety of options available to single-family and multifamily homes. Key qualifications to consider expand beyond simple EnergyStar certifications (though these should be included too) and should include digitally connected devices.
- b. **Systems Based Performance Incentives** – Due to the growing opportunities for energy efficiency upgrades within the home, the coordination and integration of all devices into the home that improve the performance of energy optimization in the home should be a measure for a successful program. This full home integration should allow for cloud-based, onsite aggregation and optimization within the home as well as consideration of the regional, grid-related impacts. For example, if a homeowner chooses to purchase several devices like an EV charger, home solar and storage, and a main panel upgrade, the coordination of said devices can account for improved onsite performance and result in even better energy efficiency when interoperable (as opposed to devices that operate independently and cannot co-optimize). Thus, digitally connected systems should be prioritized in program implementation.
- c. **Ease of Access** – As part of the effort to provide equal access to HOMES and HEEHRA rebates, a successful program should seek to ensure ease of access to home energy devices. One recommendation for such access is a simple, easy-to-understand web-based database for vendors and contractors, where the consumer can easily identify approved products and be connected to installation providers. By providing an approved vendor list, the customer can quickly identify which products and services qualify for rebates and can feel empowered to make the right choice for their home.
- d. **Diverse network of contractors** – A major consideration for whole home electrification upgrades must include installation, which is a costly portion of the expense. Therefore, while installation rebates should be included as a key component of rebate programs, it is also advisable to create program rules to surface installer options, empowering the customer to make the correct choice on installation and maintaining visibility into the contractor portion of home energy upgrades. **By clearly outlining the additional costs and available rebates before installation, the customer is aware of the total cost of the upgrade.**
- e. **Income-based compensation measures** – To help prioritize low- or moderate-income households, implementing restrictions to households below 150% of area median income can reserve allocations of upgrades to homes that benefit from them the most. Often distributed at the point-of-sale, such allocations should be sure to include the diverse portfolio of products (listed above) that lead to the greatest impact on home energy use.

Other

5. Any additional comments.

RFP and Contract Language

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

Category 3: Indication of Vendor Interest (maximum of two pages)

Company Characteristics

7. Name, contact information, company or organization that you represent.
Jeannie Salo, Vice President of Government Relations – Schneider Electric North America – Jeannie.Salo@SE.com
8. An overview of your approach to equity, diversity, inclusion, and accessibility (DEIA).
Our ambition is to become the most inclusive and caring company in the world by providing equal opportunities to everyone, everywhere; and ensure all employees feel uniquely valued and safe to contribute their best. Through our DEI efforts, we aspire to mirror the diversity of the communities in which we operate. For us, workforce diversity means we have representation of all gender identities, races, ethnicities, and nationalities; all generations, religious and cultural backgrounds, disability, and veteran status; all sexual orientations, personal and professional life experiences, and more. While we at Schneider Electric still have work to do, we believe our differences make us grow as a company and as individuals.
9. 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.

Company Summary

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

Schneider Electric has a vast amount of knowledge and experience in executing complex, innovative programs and projects across the United States. With a wealth of expertise ranging from microgrids to smart load centers, Schneider Electric is committed to partnering with State Energy Offices to provide guidance and technical know-how. Schneider Electric is happy to share examples of successful initiatives and case studies of projects that we have completed in partnership with State Energy Offices at any point in the future.

Sincerely,



Jeannie Salo
Vice President, Government Relations
Jeannie.Salo@se.com

Schneider Electric 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.