

Vermont Department of Public Service

Public comments and the Department's responses re: *Home Energy Rebate* program proposals

IRA Section 50121: Home Efficiency Rebate Program (HOMES)

Q1 Vermont should use 3E thermal for HOMES and commit a substantial portion of the HEAR funds to AMFH. (CHT)

A1 The Department intends to devote its entire funding under HOMES to the Weatherization Assistance Program overseen by the Office of Economic Opportunity (OEO). OEO will allocate funding among the state's WAP implementers. Due to a lack of alignment between the HOMES program requirements and 3E Thermal's service delivery, it may not be feasible for 3E Thermal to utilize HOMES funds. However, 3E Thermal will continue delivering weatherization services to large low-income multifamily buildings using state and federal WAP funds. The infusion of HOMES funds to other WAP implementers should free up additional funding for 3E Thermal.

Q2 Will the Department consider targeting some of the funding and outreach to the manufactured housing community? (VLS IEE)

A2 The Department will include targeted outreach to manufactured and mobile housing communities in its education and outreach strategy. Vermont's Office of Economic Opportunity and the WAP implementers will allocate HOMES funding to the manufactured housing community per the scoring system established by the WAP, which prioritizes clients based on specific criteria. These include categorical eligibility, fuel usage, age-related factors such as elderly or disabled household members, presence of children, and overall eligibility for Vermont WAP services. Points are assigned accordingly, with higher scores indicating higher priority for receiving assistance when there is a wait list.

Q3 Vermont should leverage third-party certification for market transformation. (Pearl)

A3 The Department intends to utilize the established quality assurance protocols employed by the WAP, which has staff dedicated for this purpose. The Department will explore how certifications can be used for market transformation in its implementation blueprints.

Q4 Vermont should add a single-family measured savings program to its HOMES application. (Sealed)

A4 The Department will use the modeled savings program path because the majority of Vermont households rely on delivered fuels for heating, which means the measured savings pathway is only viable in a minority of Vermont's housing units.

Q5 Vermont should prioritize investments in "permanently affordable homes." (VHCB)

A5 The Department will include an emphasis on marketing efforts to support permanently affordable homes in its education and outreach strategy but does not plan to allocate dedicated funds specifically for this initiative.

Q6 Many of the homes WAPs encounter require extensive repairs before weatherization can begin. Will the funding include any money for solving barriers to weatherization? Could any of the funding for the WAPs be utilized for non-energy-saving measures, such as home repairs, Health and Safety issues, or fossil fuel appliance replacement? (NETO)

A6 DOE does not allow use of HOMES or HEAR funds for home repair or health and safety. HEAR funds can be used for fossil fuel appliance replacement.

IRA Section 50122: Home Electrification and Appliance Rebate Program (HEAR)

Q1 The DOE guidance lists electric load service center and electric wiring among qualified products for HEAR. If the transformer for a household isn't sufficient for the added load, would they be able to use HEAR funds to pay for a transformer upgrade? (VPPSA)

A1 No. Transformers are not an eligible technology under DOE's program requirements. These costs would be borne by the utility and/or the customer.

Q2 Vermont should include induction stoves in its HEAR program. (Impulse Labs)

A2 Vermont is unlikely to include induction stoves in its HEAR program. Also not included in Vermont's proposal are heat pump clothes dryers. While induction stoves offer energy-efficient benefits, the Department is prioritizing replacing fossil fuel infrastructure and reducing energy bills, particularly for lower-income households. The Department determined that heat pumps and heat pump water heaters deliver the biggest cost savings to customers. Additionally, the vast majority of inquiries the Department received from the public during program development concerned heat pumps, which are the focus of the HEAR proposal.

Q3 Vermont should make HEAR funds available to entities building housing for moderate-income residents in manufactured home communities. (VHCB)

A3 The Department is working with the Energy Efficiency Utilities to develop a new construction component of its HEAR program. The inclusion of manufactured housing for moderate-income households will be considered.

Q4 Vermont PSD should include smart panels as eligible technologies for each of the proposed HEAR programs, including the Low-Income Electrification program, Affordable Multifamily Housing New Construction program, and the Moderate Income Heat Pump Rebates program. (SPAN)

A4 The Department will include electric service upgrades, including smart panels, as rebate-eligible technologies in its low- and moderate-income HEAR programs when the qualifying household is also installing cold-climate heat pumps.