Narrative Document for the Oregon Department of Energy
IRA SECTION 50121: Home Efficiency Rebates

Contents

Home Efficiency Rebates State Programs (50121)

Use of Funds and Rebate Eligibility

Section 3.1.1: Use of Funds

1. Provide which types of allowable costs the State proposes within each category of administrative funds and rebate funds and within those categories:

   Note: These responses should correspond with the Standard Form 424, Standard Form 424A, and Budget Justification Workbook.

The Oregon Department of Energy (ODOE) plans to use ***administrative funds*** to cover the following types of activities:

- *Program Planning and Design* - $246,673.11

The state will contract with two organizations for rebate implementation. Through a subgrant with Energy Trust of Oregon and a contractor to be identified through a Request for Proposals process, ODOE will partner with organizations with proven success in market uptake, high quality installations, income verification, and delivering benefits to low-income households. Energy Trust administers ratepayer-funded energy efficiency programs under an operating agreement with the Oregon Public Utility Commission serving customers of investor-owned utilities. The state or the state's implementers may subcontract with another organization to address income verification needs; however, this will be determined during the design of the Implementation Blueprint.

- *State Program Staff* - $2,456,185.03

The state plans to support 2 full time staff members (a Program Analyst and Public Service Representative), 1 limited-duration staff to support workforce outreach/research/coordination (a Program Analyst), and partially support another 2 staff members (Business Operations Manager and Grants Officer), with the intent that their time will be split between the 50121 and 50122 awards. ODOE's accounting systems can separately track these different funding sources, and internal policies are in place to ensure the time is accurately tracked. Estimate includes fringe benefits.

- *Development of Tools and Systems (including websites, applications, rebate processing, and reporting)* - $678,253.11

The state plans to issue a Request for Proposal to procure a system for rebate tracking with user interfaces and systems for households, contractors, and others to apply for rebates, submit required documentation, etc. (to potentially include income verification, depending on the capability and role of the entity).

- *Program Evaluation and Consumer Satisfaction Surveys* - $445,632.77

The state’s implementers will conduct consumer surveys and, depending on availability of resources, focus groups to assess the effectiveness of program outreach and delivery, and satisfaction with rebates and products. The implementation contractors and other providers (e.g., income verification services, if needed) will also be required to fulfill data reporting and analysis per the contracts.

- *Program Monitoring and Audits* - $1,023,885.79

In addition to state staff monitoring program delivery and overseeing the implementation contractors, the state anticipates utilizing an external firm to supplement fiscal and program compliance, as well as some legal oversight of contracts.

- *Consumer Protection Functions (including resolution procedures, data review, contractor management, installation standards, continuous improvements)* - $713,012.34

In response to findings from periodic assessments of program performance (as well as any identified problems that arise throughout implementation), the state’s implementation contractors will institute changes to address deficiencies in program design and/or delivery. The state’s implementers will develop consumer protection guides or one-pagers in multiple languages that will be provided to all rebate applicants as one part of the consumer protection strategy. The state will also dedicate staff to respond to consumer questions and/or complaints, as well as fulfill contractor management needs with regular reviews of program implementer (and other contractor) data submission.

- *Marketing, Education, and Outreach (including the funding of local governments and place-based organizations to assist with these activities)* - $557,019.59

The state has held four community engagement sessions — which included participation from retailers and product manufacturers and distributors — to better understand community interests and inform the program design. ODOE is committed to transparency and integrating the priorities of Oregonians into program design and will therefore continue to hold community engagement sessions as needed to convey details of the program. The state, with assistance from its implementers, will develop marketing and education information for homeowners, tenants, retailers, contractors, and others as needed. This may include travel to communities for in-person engagement, as well as travel to NASEO, Energy Star Partner Meetings, and/or US DOE conferences, and program education/development.

- *Implementation Contract Cost (not including rebates and costs for activities directly related to delivery of rebates)* - $2,977,734.11

The implementation contractors will use administrative funds for data review and reporting and to fulfill other programmatic management requirements not otherwise accounted for in other administrative categories.

- *Contractor Training* - $178,253.07

Contractor training and/or review of a contractor's certifications will be required before a contractor is placed on the qualified contractor list. This training will specifically assist contractors in participating in the rebate program.

- *Activities to Improve Access to Rebates, Facilitating Leverage of Private Funds and Financing Mechanisms Where Beneficial to Efficiency and/or Electrification Projects* - $56,367.35

Depending on availability of resources, the state's implementation contractors will engage financing organizations to assist in making low-cost financing available to rebate applicants and providers (e.g., contractors).

- *Installation Incentives* - $270,684.00

ODOE intends to utilize administrative funds to support the bulk of the required installation incentives. These administrative dollars will cover approximately 1,353 incentives at $200 each.

- *Technical Assistance* - $1,782.531.07

Depending on availability of resources, the state's implementation contractors may provide technical assistance either directly or through specialized organizations.

The state certifies that costs will not be duplicated on the 50122 award, or other awards, and are not duplicative of costs captured in the Indirect Rates.

The state plans to use ***rebate funds*** to cover the following types of activities:

- Rebates for Allowable Products - $43,078,598
- Audits for Low-Income Homes - $2,282,000 (additional information provided in response to question #2)
- Installation incentives (additional information provided in response to question #2) - $185,716

- Provide the total amount of estimated administrative funds to be expended annually:

$1,897,705 = Sum of the administrative funds listed above ($11,386,231) divided by 6 years

- Provide the total amount of estimated project-related costs as a portion of the rebate funds to be expended annually:

$411,286 = Sum of the rebate funded project-related costs for audits and installation incentives ($2,467,716) divided by 6 years
or 5.7 percent = Sum of the rebate funded project-related costs for audits and

installation incentives ($2,467,716) divided by the amount available for rebates ($43,078,598)

2. If requesting additional rebate funds for project-related activities, describe and justify each activity and associated budget in the budget justification worksheet.

The state would like to request using rebate funds to cover the following types of project-related activities:

- *Installation Incentives* - $185,716: $104,200 will be made available by ODOE's subrecipient implementer, Energy Trust of Oregon, while the remaining $81,516 will be available by our second implementer (yet to be named).

Given the state's goal of delivering 40 percent of rebates to low-income households in DACs, the state may require as much as $185,716 for installation incentives. This is supplemented by an additional $270,684 ODOE intends to use for such purposes with administrative funds. ODOE proposes to leverage early administrative funds initially intended for an outreach and engagement contractor (which ODOE ultimately leveraged existing staff resources for) to put toward installation incentives.

- *Audits for Low-Income Homes* - $2,282,000: $1,280,000 will be made available by ODOE's subrecipient implementer, Energy Trust of Oregon, while the remaining $1,002,000 will be available by our second implementer (yet to be named).

Aligned with the state's priority of having minimal costs come out of the pockets of low-income households for the HOMES program — and given the requirement of having a home energy audit performed — the state would like to set aside funds to cover the costs of these audits for low-income homes. ODOE has maximized its administrative funds and does not have access to additional state funds for this purpose.

3. Describe how the State will manage and ensure that rebate minimums and administrative maximums are adhered to over the duration of the program.

Administrative Efficiencies:

The state will take several steps to reduce the costs of administration and project-related activities. ODOE plans to use the US DOE/Pacific Northwest National Laboratory (PNNL) Tracking System's API (available to states, vendors, modeling tools, etc.) to minimize the costs of data tracking and reporting. By making use of the DOE/PNNL Rebate Tracking System, the state will dramatically reduce the need for repeated data entry and associated errors, and simultaneously ensure much greater data consistency. ODOE will also investigate systems that can use "smart" technology to automatically read uploaded documents for income verification and/or other purposes. For example, the state would like to use a system (if not cost-prohibitive) that accurately reads the applicant's information, including address, on enrollment cards from various categorically eligible programs. In terms of ensuring that administrative limits are maintained, the state will closely track and report administrative spending as well as spending on funds that are provided as rebates and as incentives to contractors. The state will also follow Generally Accepted Accounting Principles (GAAP) and conduct audits at least every 5 years through a contractor that is to be determined.

ODOE has experience with federal grant performance reporting and is confident in its established protocols and systems for successful implementation of the HOMES program. Additionally, ODOE's staff possess the necessary expertise and qualifications to deploy funds provided to this program. ODOE intends to leverage the agency's internal structure to manage, oversee, and report on these funds. This structure involves several distinct features with segregated roles and responsibilities. ODOE adheres to and complies with statewide accounting and internal control guidelines.

During program implementation, ongoing review and monitoring is provided by the Grants Officer to ensure expenditures are allocable to the federal award, are necessary and reasonable, and are financially prudent. Monthly and quarterly financial monitoring and reporting documents are prepared by ODOE's Budget Analyst to assist the Grants Officer to ensure expenditures do not exceed the grant award and approved budgets. The Grants Officer also works closely with program staff during the development of quarterly progress reports to ensure accurate information is provided and then enters the quarterly report information into PAGE. This review compares progress and achievements to stated milestones to ensure program targets are achieved.

Rebate Funds Management:

The DOE Rebate Tracking System will ensure that rebate amounts comply with program requirements. Rebate applications will only be approved for the rebate amounts (and percentages) associated with their income level (i.e., above and below 80 percent AMI) and the product types included in the home energy model. The DOE Rebate Tracking System will include a database with records of all previously issued rebates to individual residential dwellings. In order for a rebate to be reserved, Oregon's rebate processing system will query the DOE database to ensure that a rebate for that product type has not yet been redeemed for that address and that rebate funds committed to that address do not exceed the relevant cap. The state will also use the DOE Rebate Tracking System to track the amount of rebate funds committed to date and will only approve new reservation requests if sufficient funds remain. When Oregon's rebate processing system approves a reservation, the DOE Rebate Tracking System will put into place a "reservation" of funds (equivalent to the maximum value of that project); the reservation will remain in place until either the project completion materials have been received and approved, or the reservation expires, whichever is first. The state also plans to establish reserves within the DOE Rebate Tracking System to ensure that sufficient funds are in place (and maintained) for specific uses (e.g., minimum of 40 percent of rebate funds for low-income and at least 10 percent for low-income multifamily).

4. Confirm that the state will have a process for handling returns of rebated items as applicable in the Consumer Protection Plan.

☒ Yes, the state confirms the above statement.

Section 3.1.2: Rebate Conditions and Levels

5. Provide the maximum rebate amounts that will be offered within the allowances of the Home Efficiency Rebates requirements.

Note: States may increase the maximum rebate amounts available for low-income households, but States cannot set lower rebates than specified in Section 3.1.2.

For households with incomes greater than 80 percent AMI, the state will use the maximum levels that USDOE allows, as summarized in the following table:

Housing Type	Savings Estimate	Income Level	Maximum
Single-family	20%-34 percent	Low-Income	Lesser of $8,000 or 100% of cost
Single-family	20%-34%	Moderate- and Higher-Income	Lesser of $2,000 or 50% of cost
Single-family	35% or greater	Low-Income	Lesser of $10,000 or 100% of cost
Single-family	35% or greater	Moderate- and Higher-Income	Lesser of $4,000 or 50% of cost
Multi-family	20%-34%	Low-Income*	Lesser of $8,000 per unit or 100% of cost
Multi-family	20%-34%	Moderate- and Higher-Income**	$2,000 per unit up to $200,000 per building
Multi-family	35% or greater	Low-Income*	Lesser of $10,000 per unit or 100% of cost
Multi-family	35% or greater	Moderate- and Higher-Income**	$4,000 per unit up to $400,000 per building

* A building with at least 50 percent of households with incomes less than 80 percent AMI.
**A building with at least 50 percent of households with incomes 80 percent AMI and greater.

ODOE's response to question #13 describes the justification for raising the maximum amount available to households with incomes less than 80 percent AMI.

6. Identify the allowable project costs for determining rebate levels when based on project

cost.

☐ Defer response to State Implementation Blueprint.

Allowable project costs include all energy efficiency improvements (equipment and installation/labor) associated with the anticipated energy savings. Allowable project costs may also include related project costs (e.g., work related to the efficiency improvement such as duct modifications, design or sizing calculations, home assessments, energy audits, and project quality assurance). The more expansive list of eligible project costs will be applied to all projects in the interest of consistency, but the goal is to provide flexibility to cover cost specifically for low-income households given that low-income households are not likely to be able to pay for these additional requirements and do not necessarily have access to other programmatic resources to cover these costs. We have also set aside funding specifically to cover the cost of assessments and modeling for less than 80 percent AMI households, as we expect this cost to be a barrier to accessing the program for many potential participants. For those above 80 percent AMI, we expect the homeowner (or another program such as a tax credits) to support related project costs such as duct modifications/improvements, design or sizing calculations, home assessments, etc.

7. List the documentation requirements related to project costs from homeowners, contractors, and/or aggregators.

☐ Defer response to State Implementation Blueprint.

For each project, the contractor must provide an invoice with the following information:

- Line-item costs of equipment and materials
- Labor costs
- Model numbers for heating, cooling, and hot water systems (if geotagged photos of installations include model numbers, that is acceptable)
- The address where the work was performed
- The name and contact information for the contractor(s) performing the work
- The date(s) on which the work was performed
- The total project cost prior to the rebate and the rebate amount
- Line-items for all rebates and discounts received, including the Home Energy Rebates
- Line-item costs for any assessments/or modeling, if these costs were covered by the HOMES program
- Other project costs, as applicable (e.g., permitting costs)

Upon project completion, the invoice must be signed and dated by the homeowner or building owner.

8. Describe how homeowners and multifamily building owners will be informed of additional program funding available from non-Federal funds and grants.

☒ Defer response to State Implementation Blueprint.

Oregon House Bill 3630 directs ODOE to develop a "one stop shop" for information about residential energy efficiency programs available in the state. Oregon has published this resource – the Energy Hub for Incentive Programs & Projects in Oregon (HIPPO) – and it is now available at https://incentives.oregon.gov. The Energy HIPPO enables users to enter basic information about a household (including the household size, income, housing type, and location) and produces a summary of and links to existing rebate programs for which they may qualify. Once established, the Home Energy Rebate programs' website will direct homeowners and multifamily building owners to the HIPPO. In addition, during the application process, homeowners, multifamily building owners, and contractors will be provided a link to the HIPPO and will be encouraged to explore other funding that may be available for their project. In addition, and most importantly, HOMES will have skilled and knowledgeable program implementers working closely with households and contractors to develop projects, and these staff will be able to help applicants identify and access additional funding opportunities quickly and efficiently.

9. Provide the date after which upgrade projects must be completed for the purposes of being eligible for a rebate under the State program.

☒ Defer response to State Implementation Blueprint.

ODOE anticipates that the program will launch in late 2025 or early 2026. Households that apply to receive a rebate for an upgrade that was completed on or after August 16, 2022, but before the state's program launches, are eligible for a HOMES rebate, but completed projects are still subject to all program requirements, and program implementers will review all applications for eligibility using the same standards and processes. Retroactive rebate applicants will be required to provide all information noted in the Data & Tools Requirements Guide (e.g., final scope of work, signed invoice with detailed costs, etc.) as well as documentation demonstrating that the upgrade project meets all program requirements (e.g. the use of an enrolled contractor, completion of a home assessment and energy savings model, etc.). All approved rebate reservations will be set to expire six months following approval of the application. Contractors with an approved reservation must complete all installations and submit the required completion materials before the expiration date. If the project is not on track to be completed before the reservation expires, the contractor may request a 180-day extension. When a reservation expires, the rebate funding will be unreserved, and, as a result, contractors seeking a rebate after expiration will have to resubmit an application. If the contractor resubmits the same application details, their resubmitted application will be immediately accepted; changes to the initial project details will require staff re-review. Contractors may

resubmit an application for an expired rebate, even if the project has already been completed. Prior to a reservation being approved, contractors will be provided notice of the reservation's expiration date and will be required to digitally sign an attestation stating that they understand the expiration rules.

10. Identify whether, for low-income multifamily buildings, the State will calculate the "per dwelling unit" rebate amount at the less than 80 percent AMI amount for all units or based on the ratio of LMI to non-LMI units.

☒ At the less than 80 percent AMI amount for all units
☐ Based on the ratio of LMI to non-LMI units

11. Describe how the State plans to value energy savings based on time, location, or greenhouse gas emissions. The application must demonstrate a strategy for either prioritizing, or requiring in program rules:
    a. Retrofits that will have a disproportionate benefit based on the time or location of energy savings; or
    b. A targeted approach to prioritize reduction in greenhouse gas emissions.

    Valuing savings as part of this plan does not replace or count towards the requirements to demonstrate a minimum percentage energy savings for the household on a modeled or measured basis.

☒ Defer response to State Implementation Blueprint.

The program will center education and outreach efforts on measures that deliver savings coinciding with peak system usage in the summer and winter, which are driven by cooling and heating loads, respectively. Investor-owned utility system peaks are reported to the Oregon Public Utility Commission (OPUC), which factors capacity benefits into an annual assessment of the resource value of energy efficiency. The state will leverage the resource value, driven by time of savings, to prioritize HVAC and weatherization measures. A program rule will require any proposed project, including HVAC at a site with weatherization potential, to scope and present to the customer weatherization measures, including prospective cost savings from downsized mechanical systems. Finally, the program will work with utilities to determine where electricity demand constraints will impact residential energy cost and to position the program as a coordinated resource to utility-led, location-based, non-wires alternatives campaigns. In the state's investor-owned utility service areas, these constrained areas are identified by utilities and communicated during regulatory proceedings and through direct meetings. Energy Trust maintains separate operating agreements with the investor-owned utilities and amends site records to note locations within constrained areas and collaborates with utilities to address location-based capacity constraints.

12. Describe how the State plans to ensure and verify ENERGY STAR certification at the time of installation for heating, cooling, and water heating products.

The state will require installers to submit geotagged photos for all heating, cooling, and water heating projects that will include model numbers. Submitted through the contractor, implementer, or aggregator, implementers will then review this information to ensure that equipment complies with requirements. Upon review, if an installer installs equipment that is not ENERGY STAR certified, they will receive a warning notice that includes educational information to help them ensure future projects meet the requirement. If they install non-qualifying equipment a second time, the state may remove the installer from the enrolled contractor list. The state also plans to ensure that major distributors and retailers understand the rebate requirements and ask them to refer to the EPA's Qualified Products Lists on a regular basis or, preferably, have an automated method of keeping the information up to date through a link to EPA's Qualified Products Lists if available.

13. A State interested in offering higher rebates amounts than those listed in Tables 2 and 3 for low-income households must describe (in the below box) the State approach for balancing higher rebate amounts (serving fewer households) with the required allocation to serve low-income households and must propose the maximum rebate amount that would be available to low-income households both in terms of percentage of project cost and dollar amount for low-income households. Please provide the amounts below or check N/A if not applicable.

☐ N/A. State will use the maximum rebates listed in Tables 2 and 3.

i. Receive an energy upgrade that is modeled to save at least 20 percent of energy.
   - percent of project cost: 100
   - $ amount for low-income household: $8,000

ii. Receive an energy upgrade that is modeled to save at least 35 percent of energy.
   - percent of project cost: 100
   - $ amount for low-income household: $10,000

ODOE's rationale in offering higher rebate amounts is that households with incomes below 80 percent AMI are unlikely to be able to afford any additional costs. The IRA

suggested limits are too low to cover a project that must reach at least 20 percent energy savings. The state does not want to place additional burdens on low-income households and therefore wants to allow rebates to cover 100 percent of the costs. Contractors and the selected program implementers will be required to consider options for stacking the rebates with other allowable incentives; where stacking is available, the rebates would not need to cover 100 percent of costs.

For the modeled approach, the state has placed a cap of $8,000 per low-income household that reaches at least a 20 percent energy savings and a cap of $10,000 per low-income household that reaches at least a 35 percent energy savings. If every Home Efficiency Project applied this ceiling, it would translate to half as many comparable projects in the 20-35 percent energy savings and about 20 percent fewer projects achieving greater than 35 percent energy savings (since IRA proposed low-income households on projects with at least 20 percent energy savings to cap at $4,000 and those with at least 35 percent savings to cap at $8,000). The state does not expect that this would be the case, since there are many opportunities to stack funds for low-income households and many non-low-income households will want to avail themselves of these rebates. In addition, ODOE is currently developing a single resource containing information about energy efficiency incentives available statewide (as described in response to question #73 below), and this resource will also help contractors determine how different funds could stack.

14. Provide details on what portion(s) of the total rebate will be provided to the homeowner/building owner compared with the contractor/aggregator.

☐ Defer response to State Implementation Blueprint.

When initiating the rebate reservation, the contractor will be required to deduct the rebate amount associated with the modeled energy savings. The rebated amount must be included on the invoice that the homeowner must sign before the contractor/aggregator can receive the rebate reimbursement.

a. Describe what caps the state will place on contractor/aggregators in terms of savings exceeding the amount associated with the rebate provided to the homeowner (e.g., allowable percentage above the rebate provided to homeowner).

☐ Defer response to State Implementation Blueprint.

The state is choosing to use a modeled approach and will not be providing a portion of the rebate to contractors or aggregators, so this cap is not needed for ODOE's proposed program.

15. Describe what systems will be put into place to reserve funds for each measured project, given the need to remit payment to the contractor/aggregator after 9-12 months of usage data post-energy upgrade is available.

☐ Defer response to State Implementation Blueprint.

Not applicable

16. For the measured program path, describe how the State will calculate rebate levels based on average home energy usage in the State[1].

☐ Defer response to State Implementation Blueprint.

Not applicable

17. For the measured program path, within what timeframe will the State provide rebates to eligible rebate recipients?

☐ Defer response to State Implementation Blueprint.

Not applicable

Section 3.1.3: Low-Income Homes

18. What portion of the rebate funds will the State reserve for low-income households and multi-family households?

The state plans to allocate a minimum of 40 percent of rebate funds to low-income households (i.e., households with incomes less than 80 percent of AMI). This is consistent with the percentage of low-income households in the state, which is 40 percent. In addition, the state plans to allocate a minimum of 10 percent of rebate funds to support projects in low-income multifamily buildings.

19. Describe how the State will define household income for verification purposes (e.g., using prior year income).

Oregon will define household income as the combined gross income for all adult household members for the past 12 months. Prior tax year gross earnings will also be an acceptable means for demonstrating household income. This definition aligns with existing programs in the state, including those operated by Energy Trust of Oregon and the Bonneville Power Administration. Energy Trust currently uses the following definition of income for its Savings Within Reach and Solar Within Reach programs: "Income includes all gross wages, tips, rental income, public assistance, social security or pensions, income from self-employment, alimony, interest, or any other sources of income defined by the IRS income tax return for the previous tax year."

[1] Per statute, the measured energy saving of the home or portfolio of homes must achieve 15% savings, but the calculation of the rebate is based on a 20 percent reduction of average energy use of a home in the state.

Households that demonstrate categorical eligibility, based on documentation of participation within the most recent program renewal period for the pre-qualifying program, will not be required to submit household income information.

20. For single-family households, describe what combination of methods will be used for claimants to be able to establish their household income for income qualifications. States may select the following options:

☒ Documentation of household income (for example, 1040)
☒ Documentation of enrollment in a pre-qualifying program
☐ Self-attestation of either income level of enrollment in pre-qualifying program

The rebate intake system, which will collect and store income information from either the applicant or a third party working on the applicant's behalf, will provide the following options for customer income qualification:

1. Submission of documentation verifying household income and attestation to household size. Accepted documentation includes the previous year's tax transcript.
2. Documentation verifying eligibility for pre-qualifying programs. As detailed in response to question #30, Oregon will allow categorical eligibility for participants in any of the USDOE-approved programs. Customers will have to submit appropriate documentation of participation in at least one of the following programs:
   - Low Income Home Energy Assistance Program (LIHEAP)
   - Medicaid
   - Supplemental Nutrition Assistance Program (SNAP)
   - Head Start
   - Lifeline Support for Affordable Communications (Lifeline)
   - Food Distribution Program on Indian Reservations (FDPIR)
   - National School Lunch Program – Free (NSLP)
   - Housing Improvement Program (HIP)
   - Housing Opportunities for Persons with AIDS
   - Supplemental Social Security Income (SSI)
   - Weatherization Assistance Program (WAP)*
   - Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)**

*In 2025, for 2024, households of one to four people, in any county in Oregon, may qualify for categorical eligibility through WAP. Households of any size may qualify in Benton, Clackamas, Columbia, Deschutes, Hood River, Multnomah, Washington, and Yamhill Counties. Customers providing documentation of eligibility through WAP will additionally need to provide an attestation to household size. Households that are not categorically eligible through WAP may still apply for higher rebate amounts through another program or through the income verification method.

**In 2025, for 2024, households of one to five people, in any county in Oregon, may qualify for categorical eligibility through WIC. Households of any size may qualify in Benton, Clackamas, Clatsop, Columbia, Deschutes, Hood River, Multnomah, Washington, and Yamhill Counties. Customers providing documentation of eligibility through WIC will additionally need to provide an attestation to household size. Households that are not categorically eligible through WIC may still apply for higher rebate amounts through another program or through the income verification method.

The program implementers will be responsible for reviewing the submitted information to verify it is accurate.

21. For multifamily buildings, describe what combination of methods will be used to verify that at least 50 percent of dwelling units consist of households with incomes less than 80 percent AMI.

☒ Defer response to State Implementation Blueprint.

For multifamily buildings to qualify for the multi-family low-income rebate limits, at least 50 percent of occupied dwelling units must be verified as low income. The rebate intake system, which will collect and store income information from either the applicant or a third party working on the applicant's behalf, will provide the following options for customer income qualification:

1. Submission of documentation verifying household income and attestation to household size. Accepted documentation includes the previous year's tax transcript.
2. Documentation verifying eligibility for pre-qualifying programs. As detailed in response to question #30, Oregon will allow categorical eligibility for participants in any of the USDOE-approved programs. Customers will have to submit appropriate documentation of participation in at least one of the following programs:

- Public Housing (housing owned by Public Housing Authorities)
- Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)
  - Whole building is eligible if 50 percent of housing units are subsidized through these programs.
- Privately-owned multifamily buildings that house residents receiving tenant-based assistance
  - Whole building is eligible if 50 percent tenants are receiving this assistance.
- Low Income Housing Tax Credit (LIHTC)

- Whole building is eligible if 50 percent of housing units are income-restricted.

Unoccupied units receiving an upgrade may qualify as low-income units; however, for these units, the building owner will be required to adhere to the same renter protections and affordability requirements that apply to low-income units.

22. Please confirm the following:
    - Claimant will be required to note the number of individuals who occupy the dwelling unit.

    ☒ Yes, the State confirms the above statement.
    - Claimant will be required to sign a statement attesting to the validity of all information provided (e.g., enrollment documents, household income, number of full-time occupants) irrespective of the method of income qualification (e.g., categorical eligibility, self-attestation).

    ☒ Yes, the State confirms the above statement.
    - State's intake system for users to provide income information will display the 80 percent AMI value for that household's ZIP code and household size to assist the household in comparing its income with those levels prior to signing statements regarding their income.

    ☒ Yes, the State confirms the above statement.

23. Describe how the 80 percent AMI levels for each location will be kept up-to-date (use DOE-provided API, other) and linked to DOE systems. Confirm that these levels will correspond to (a) the address of the home at which rebates will be applied and (b) the applicable number of household occupants.

    ☐ Defer response to State Implementation Blueprint.

Oregon intends to use a rebate administration system that links with the USDOE-provided API to verify income. This system will rely on the API to update 80 percent AMI levels corresponding to household addresses and occupancy.

24. Confirm that the State will:
    - Review information provided to support income eligibility for all applicants applying for higher income-based rebate levels.

    ☒ Yes, the State confirms the above statement.

    - Take steps to verify income eligibility for all applications (100 percent) that use self-attestation to support income eligibility (e.g., confirm enrollment in at least one program that the applicant asserted enrollment in; confirm household income via IVES or other methods as applicable).

☐ Yes, the State confirms the above statement.

- After 6 months and not longer than 1 year after program launch, report to DOE the percentage and number of applicants that received rebates but were subsequently found to not meet eligibility requirements.

☐ Yes, the State confirms the above statement.

- Work with the state's DOE project officer to institute additional safeguards or determine if a lesser level of review for applicants using self-attestation is justified depending on the percentage/number of rebates issued without meeting eligibility requirements.

☐ Yes, the State confirms the above statement.

If applicable, propose the types of information that the State will provide to DOE to warrant reducing this requirement (e.g., allowing implementers to verify income of a subset of claimants through random sampling).

☒ N/A. The State will not reduce this requirement.

Oregon will verify all income-qualified applicants before approving a rebate reservation.

25. Provide additional information as needed to demonstrate that the proposed approaches for income verification will address all types of households; not create undue burden for claimants; and include safeguards to minimize error and abuse in the process of verifying income.

Oregon's HOMES program will provide applicants the following options for income verification:

1. Submission of documentation verifying household income and signing of an attestation to household size. Accepted documentation will include tax transcripts.
2. Documentation verifying eligibility for pre-qualifying programs.

Oregon's income verification process is intended to provide flexibility (multiple pathways for income verification) to rebate applicants while ensuring adequate protections are in place to prevent fraud, waste, and abuse. Applicants will be provided with detailed guidance for how to access and submit the necessary documentation; this will include clear guidance regarding the types of acceptable documentation for both pathways. Project reviewers will receive detailed guidance and training for reviewing these materials for completeness, appropriateness, and accuracy. ODOE already successfully employs these income verification processes in existing state incentives programs, so we are confident that our HOMES processes will minimize error and abuse.

As a safeguard to discourage applicants from falsifying income information, all applicants, when submitting income verification information, will be required to sign a statement confirming they understand the following:

> *By signing this form, the household attests that the information contained in this form as well as any eligibility document(s) provided to the Oregon Department of Energy are true, correct, and authentic. Furthermore, the household acknowledges that if the document content has been altered or the household size falsified, the Department may order the revocation of the rebate and may pursue appropriate legal action against the household, as appropriate. If the rebate has already been applied to a purchase or service, the homeowner or building owner will be responsible for repaying the state for the rebated amount.*

26. Describe how the State will verify (confirm legitimacy) of income information for all claimants (e.g., verification within 2 days through IRS, cross-check with enrollment databases of approved programs, calls to employers). If applicable, propose the types of information that the State will provide to DOE to warrant reducing this requirement (e.g., allowing implementers to verify income of a subset of claimants through random sampling).

☒ N/A. The State will not reduce this requirement.

☐ Defer response to State Implementation Blueprint.

27. Describe how the State will resolve instances when rebates are provided to those who have falsified their incomes.

☒ Defer response to State Implementation Blueprint.

Oregon will verify all income information before approving a reservation for a low-income rebate. If the program implementers discover that income documentation has been falsified, the appropriate response will depend on when the fraud is discovered:

- If falsified income documentation is discovered during application review, implementers will reject the application and notify the applicant and/or homeowner that their documentation has been rejected.
- If falsified income documentation is discovered after a rebate has already been reserved, implementers will immediately cancel the reservation and notify all parties (i.e. the homeowner, and – if applicable – the renter and contractor) that the low income rebate no longer applies to their project and that the higher-income limits will apply (and what the new rebate amount is), if they continue with the installation.
- If falsified income documentation is discovered after a rebate has already been issued, implementers will notify the contractor and homeowner that

the homeowner is responsible for reimbursing the program within 30 days for the appropriate amount.

The program application will require building owners to agree to a set of terms and conditions that will inform customers that the state will seek rebate reimbursement from customers if submitted income documentation is proven to be falsified post project reimbursement. Customers that have been identified as knowingly providing false information may be disqualified from future participation in any state programs.

Parties will be given an opportunity to contest these rejections and the low-income rebate amounts may be approved or re-approved if appropriate income documentation can be submitted within 30 days and verified by the program implementers.

28. If proposing to allow self-attestation as a means for initial income qualification, provide a detailed description of how and when this approach will be used. Include statements, language, and detailed information regarding follow-up steps that will be used for this process. Additional topics to address include:
    - Describe how those applying for rebates will be warned of potential liability associated with falsifying information.
    - Explain how signed statements of self-attestation will be securely stored.
    - Identify what level of falsified attestations will signal that the system needs to shut down either permanently or be restarted only after sufficient improvements are made.

☐ Defer response to State Implementation Blueprint.

☒ N/A. The State has chosen not to allow self-attestation.

29. Describe how the State program will verify applicant information provided to substantiate income eligibility, including systems that will be used to verify, where applicable, that at least one member of a household has been enrolled in a program included within the [Federal Programs Approved for Categorical Eligibility](#) document or other state-proposed approved by DOE within the prior 12 months.

☒ Defer response to State Implementation Blueprint.

Program implementers will review all income documentation submitted for an income-qualified rebate to verify: 1. That the documentation is acceptable and official (i.e., a tax transcript or an official letter of enrollment in a prequalifying program); 2. The address(s) and at least one name on the documentation matches the project information. 3. All required household members have submitted their income information. If the documentation is insufficient or unclear, implementers will be required to contact the owner or renter for corrections/clarifications. If the issue cannot be adequately resolved, the application for an income-qualified rebate will be denied (although applicants may still apply for a higher-income rebate).

30. If applicable, identify the Federal or other programs by which the State plans to allow categorical eligibility.

☐ N/A. The State will not propose additional Federal or other programs to be considered for categorical eligibility.

Oregon will use all approved programs in the federal guidance. These are:

- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Head Start
- Lifeline Support for Affordable Communications (Lifeline)
- Food Distribution Program on Indian Reservations (FDPIR)
- National School Lunch Program – Free (NSLP)
- Housing Improvement Program (HIP)
- Housing Opportunities for Persons with AIDS
- Supplemental Social Security Income (SSI)
- Weatherization Assistance Program (WAP)*
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)**

*****In 2025, for 2024, households of one to four people, in any county in Oregon, may qualify for categorical eligibility through WAP. Households of any size may qualify in Benton, Clackamas, Columbia, Deschutes, Hood River, Multnomah, Washington, and Yamhill Counties. Customers providing documentation of eligibility through WAP will additionally need to provide an attestation to household size. Households that are not categorically eligible through WAP may still apply for higher rebate amounts through another program or through the income verification method.

****** In 2025, for 2024, households of one to five people, in any county in Oregon, may qualify for categorical eligibility through WIC. Households of any size may qualify in Benton, Clackamas, Clatsop, Columbia, Deschutes, Hood River, Multnomah, Washington, and Yamhill Counties. Customers providing documentation of eligibility through WIC will additionally need to provide an attestation to household size. Households that are not categorically eligible through WIC may still apply for higher rebate amounts through another program or through the income verification method.

Oregon will also use the housing programs outlined in the federal guidance to qualify multifamily buildings. These include:

- Public Housing (housing owned by Public Housing Authorities)

- Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)
    - Whole building is eligible if 50 percent of housing units are subsidized through these programs.
- Privately-owned multifamily buildings that house residents receiving tenant-based assistance
    - Whole building is eligible if 50 percent of tenants are receiving this assistance.
- Low Income Housing Tax Credit (LIHTC)
    - Whole building is eligible if 50 percent of housing units are income-restricted.

31. If applicable, propose any additional Federal or other programs to be considered for categorical eligibility. For any programs not already approved, describe how the program's eligibility aligns with the Section 50121 income requirements.

☒ N/A. The State will not propose additional Federal or other programs to be considered for categorical eligibility.
☐ Defer response to State Implementation Blueprint.

32. Identify whether the State requests authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period (e.g., proof of enrollment within the past 12 months).

☒ Yes, the State requests authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period.
☐ N/A. The State does not request authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period.

If yes, explain the State's proposal and describe the rationale.

☐ Defer response to State Implementation Blueprint.

Oregon has heard from some stakeholders, including utilities, that some pre-qualifying programs are not updated every year. Accordingly, ODOE would like to allow conditional verification contingent on participation in a pre-qualifying program during the most recent renewal cycle for the program. We would limit this proof of enrollment to the most recent 2 years. For example, if a program re-confirms eligibility every two years, and an applicant last had their eligibility confirmed 18 months ago, they would pre-qualify on the basis of conditional verification. This is intended to provide flexibility for applicants.

33. Identify whether the State requests authorization to allow categorical eligibility for a program in a way that is not consistent with the "level of categorical eligibility" listed in the

document Federal Programs Approved for Categorical Eligibility. For each deviation requested, propose and provide documentation to justify the requested change. Documentation must demonstrate that the State imposes income requirements equivalent to or less than 80 percent AMI.

☐ Defer response to State Implementation Blueprint.

☒ N/A. The state will not allow categorical eligibility for a program in a way that is not consistent with the "level of categorical eligibility" listed in the document Federal Programs Approved for Categorical Eligibility.

34. Provide a brief description of the procedures and penalties the State will provide to ensure that renters are not subject to unjustified rent increases.

Before receiving a low-income rebate reservation for a rental property, building owners will be required to agree to the following statements, which will be included in the program's terms and conditions for participation:

- For at least two years following the receipt of the rebates, I will continue to rent the dwelling unit to a low-income tenant.
- For at least two years following the receipt of the rebates, I will not evict a tenant to obtain higher rent tenants based upon the improvements.
- For at least two years following the receipt of the rebates, I will not increase the rent of any tenant of the building as a result of the energy improvements with the exception of increases to recover actual increases in property taxes and/or specified operating expenses and maintenance costs.
- If the property is sold within two years of receipt of the rebates, these conditions will apply to the new owner and will be part of the purchase agreement.
- I understand that tenants have been provided with written notice of their rights and their building owner's obligations. I have received a copy of this notice. I will provide a copy of this notice to any new tenants who move in over the next two years.
- If my tenant(s) file a complaint under the terms of this agreement, I understand that I may be contacted by the program implementers, the Oregon Department of Energy, and/or the Oregon Department of Justice for more information.
- If the Oregon Department of Energy or the Oregon Department of Justice determine that I have not complied with these requirements, I understand that I must refund the rebate and that I may be required to pay damages to tenant(s), or reimburse tenant(s) and/or ODOE for any legal fees.
- I understand that ODOE reserves the right to put a lien on my property for the amount of the rebate(s) at any time within the first two years following the receipt of the rebate(s).

Homeowners will be able to submit this attestation digitally to our implementers by emailing a scan, completed pdf, or a photo; mail-in or other direct submission to our implementers, who will upload digital copies to the rebate management system; and through the application portal.

The written notification to the tenant(s) will include contact information for complaints of non-compliance. Tenant(s) will be provided information regarding their ability to seek damages and reimbursement of attorney's fees (if applicable) through small claims or civil court, if the building owner is found to be in violation of these rules.

If a tenant submits a complaint to our implementers alleging building owner violation of these rules, our implementers will investigate the complaint with the tenant(s) and homeowner and attempt to resolve the issue. If the building owner is determined to be in violation and an appropriate resolution cannot be found, the implementer will notify the designated contact at ODOE. ODOE will review the case and attempt to negotiate a solution. If these actions are not sufficient to resolve the complaint, ODOE will notify the building owner that they must return the rebate amount to the appropriate implementer. ODOE will also notify any other ODOE-run rebate programs that the building owner should be excluded from eligibility. If the building owner does not return the money within the specified timeframe, ODOE will forward the information to the Oregon Department of Justice (DOJ) for potential enforcement action. Building owners will be required to sign an attestation to their understanding and adherence to these rules and processes.

35. Explain how the State will identify eligible contractors or aggregators and what tools will be used to pay the $200 disadvantaged community incentive.

☒ Defer response to State Implementation Blueprint.

To identify projects that qualify for an installation incentive, the state will use the Northwest Clean Energy Atlas (NCEA) map of poverty and energy burden (https://www.nwceatlas.org/visualization/poverty-and-energy-burden). The data contained in this map are available to ODOE, and we will incorporate the data into the state's rebate management system and projects located in these areas will be marked as eligible for the $200 incentive and the contractor will be notified that they are eligible for the incentive, to be paid upon project completion. In multifamily buildings receiving in-unit upgrades, rebates are available per unit. For multifamily properties receiving central system upgrades, incentives are available per building. The state will also provide educational materials and do outreach to contractors so that they are aware of this potential incentive. The program website will also provide users a searchable map, which they can use to determine if an address qualifies for the $200 incentive.

Section 3.1.4: Community Benefits Plan

36. Describe how the State program will define a disadvantaged community.

    If not using the default disadvantaged community definition (low-income households located in a disadvantaged community identified by the CEJST), a State must explain how the proposed definition will meet the following three criteria as described in DOE J40 implementation guidance[2]:

- The communities of concern identified by the State tool or definition must conform to the definition of communities established in U.S. Office of Management and Budget (OMB) guidance:
    - a group of individuals living in geographic proximity to one another that experiences common conditions.
    - a geographically dispersed set of individuals (such as migrant workers or Native Americans) that experiences common conditions.
- The State tool or definition must consider two or more of the following indicators when identifying communities that should be classified as disadvantaged for the purposes of directing Federal investments under Justice40:
    - Low income, high and/or persistent poverty
    - High unemployment and underemployment
    - Racial and ethnic residential segregation, particularly where the segregation stems from discrimination by government entities
    - Linguistic isolation
    - High housing cost burden and substandard housing
    - Distressed neighborhoods
    - High transportation cost burden and/or low transportation access
    - Disproportionate environmental stressor burden and high cumulative impacts
    - Limited water and sanitation access and affordability
    - Disproportionate impacts from climate change
    - High energy cost burden and low energy access
    - Jobs lost through the energy transition
    - Access to healthcare
- The communities of concern identified by the State tool or definition must be currently mapped in software or must be easily overlayed in GIS so that communities can be easily identified by stakeholders.

To identify projects that qualify for an installation incentive, the state will use the Northwest Clean Energy Atlas (NCEA) map of poverty and energy burden (https://www.nwceatlas.org/visualization/poverty-and-energy-burden). The map identifies, by census tract, the percentage of the population who are living at or below 150 percent of the federal poverty line (below an annual income $41,625 for a

[2] See pages 8-9 of https://www.energy.gov/sites/default/files/2022-07/Final%20DOE%20Justice40%20General%20Guidance%20072522.pdf for more details.

family of four) as well as the estimated average energy burden (the percentage of annual household income spent on energy). Areas that are categorized as at least “high” for either metric, or “medium” for both metrics, will be considered eligible for the installation incentive. Tribal areas will also qualify.

Section 3.1.5: Processing and Delivering Rebate Funds to Eligible Rebate Recipients

37. Describe what types of systems will be put into place to allow effective processing of rebates.

☒ Defer response to State Implementation Blueprint.

ODOE will issue an RFP to procure a rebate processing system that will enable building owners, contractors, and renters to quickly and easily submit all the information required to receive a rebate. The state’s rebate processing system will collect and store all data and documentation submitted for a rebate reservation application and upon project completion. The application portal and program website will also provide contact information that will connect any user to a program representative who can help them quickly work through any issue.

When an applicant submits a reservation, Oregon’s rebate processing system will send the required project data (as outlined in Tables 3, 9, and 10 of the Data & Tools Requirements Guide) to the National Rebate Tracking System through the PNNL API.

Submitted applications will then be reviewed by the appropriate implementer. When the implementer encounters an application for an address that has already received a HOMES rebate, the implementer will follow up with the applicant to confirm the details are correct; if the implementer determines that a project has already received or been approved for a HOMES rebate, the implementer will deny the reservation. When the implementer encounters an application for an address that has already received a HEAR rebate, the implementer will check both project records and will deny any HOMES rebate requests for measures that have already been approved or reimbursed through the HEAR program.

ODOE and our implementers will develop rebate processing workflows that demonstrate how projects will move from initiation to completion. ODOE and our implementers will create internal guidance documents that describe the project review processes that implementer staff will be expected to follow; these instructions will include processes for handing common data and application issues, which will cut down on the time it takes to address incomplete applications. As described in the “Continuous Improvement” section of the Consumer Protection Plan, program staff will also be expected to consider recommending changes to the programs (including the workflows or the rebate processing system) that could improve the overall efficiency of the program and its processes. Once a project is approved for completion, implementers will remit payment to the contractor. Contractors will be asked to enroll in direct deposit as default, but they will also be allowed to request rebate reimbursement by check. Implementers will submit invoices for reimbursement to ODOE on a monthly basis.

38. Describe how the State will ensure processing of rebates within required timeframes (e.g., through a processing company, through program implementers, or other entities or methods). Include information on corrective actions that the State will implement in the event of lengthier processing times.

☐ Defer response to State Implementation Blueprint.

Implementers will issue reimbursements within 4 weeks of receiving the required and acceptable information. Upon completion of a HOMES project, applicants will submit project completion materials to the state rebate processing system. Oregon's two program implementers will use the rebate processing system to review these materials. For projects deemed incomplete, the implementers will work with applicants to correct any errors and ensure the project's records are complete and accurate. Contractors will be asked to enroll in direct deposit as default, but they will also be allowed to request reimbursement by check.

Implementers will be required to document the date of payment issuance, and ODOE will monitor the rate of compliance. On a monthly basis, the program's implementers will report the number of rebates that were reimbursed more than four weeks after the receipt of all required and appropriate completion materials. Projects that are flagged for missing information or for quality assurance inspection will not be included in the time to reimbursement metric until the date that all required and correct materials are submitted; this is to ensure that processing times are not determined to be out of compliance if applicants do not respond to implementer requests for correction or completion in a timely fashion. ODOE will regularly review the implementers' processing times in order to ensure payments continue to be issued within the expected timeframe. If processing times exceed four weeks for more than 10 percent of rebates reimbursed within a month for either implementer, the implementer(s) will provide an explanation, develop a resolution plan, and if necessary, implement new methods or systems to speed up processing within 30 days of notification. If the implementer fails to meet the milestones outlined in the resolution plan, the state will reserve the right to terminate the scope of work and engage another implementation company. In addition, implementers will monitor processing metrics on a weekly basis to catch any 'in-month' anomalies in processing so they can be addressed as soon as possible.

39. Describe how the proposed processing system will be integrated with a system for processing rebates under Section 50122. Note if the State plans to use separate systems.

☐ Defer response to State Implementation Blueprint.

The state will apply workflows based on the DOE/PNNL-provided workflows and use the DOE Rebate Tracking System API to provide a seamless and integrated approach to both types of rebates.

40. If the State does NOT intend to use a federally provided web-based tool to determine whether a home is in a disadvantaged community, confirm that the State will provide the ZIP codes with all disadvantaged communities as defined by the State to the DOE system.

☒ Yes, the State confirms the above statement.
☐ N/A. The State will use a DOE-provided web-based tool to determine whether a home is in a disadvantaged community.

41. Confirm that the State system will link to DOE-provided systems via Application Programming Interface (API).

☒ Yes, the State confirms the above statement.

Section 3.1.6: Data Collection and Evaluation

42. Confirm that the State will submit a Privacy and Security Risk Assessment in the State Implementation Blueprint.

☐ Yes, the State confirms the above statement and will include it with this narrative document.
☒ Yes, the State confirms the above statement but defers a response to State Implementation Blueprint.

43. Explain how data will be protected, specifically addressing security measures and privacy measures.

☒ Defer response to State Implementation Blueprint.

The State of Oregon follows stringent regulations and policies to protect Personally Identifiable Information (PII) and consumer privacy. These protections include the following key policies and legal frameworks:

1. Oregon Identity Theft Protection Act (ORS 646A.600 - 628): This law requires state agencies and businesses to implement reasonable security measures to protect PII. PII such as Social Security numbers, driver's license numbers, and financial account numbers must be encrypted when stored electronically or transmitted. In the event of a data breach, entities are required to notify affected individuals promptly and provide information about the breach and the steps being taken to mitigate its impact.
2. Oregon Statewide Information Security Policy (Policy 107-004-020): Oregon Statewide IT Security Policies (Policy 107-004-020) ensure that systems are secured through strong encryption, access control, and monitoring

mechanisms. This policy establishes statewide guidelines for protecting the confidentiality, integrity, and availability of sensitive information, including PII. The policy mandates access controls, encryption standards, and the use of secure authentication methods to ensure that only authorized personnel can access PII.

3. Oregon Administrative Rules (OAR) Chapter 125-800: Oregon Administrative Rules (OAR 125-800) enforce standards on encryption, access control, and network security to protect state data from unauthorized access and cyber threats. These rules provide a comprehensive framework for safeguarding electronic information, including PII, within Oregon state agencies. Specifically, OAR 125-800-0100 covers securing PII through encryption, access controls, and regular security audits to ensure data protection. OAR 125-800-0150 sets requirements for network security to prevent unauthorized access and ensure the confidentiality of PII during transmission over state networks.
4. Oregon Data Classification Policy: Oregon's Data Classification Policy ensures that data is classified based on sensitivity, with appropriate measures applied to safeguard confidential and restricted information. PII falls under "confidential" data classification, meaning it is subject to stricter protection measures. The classification policy enforces strict access controls, encryption requirements, and data handling procedures to safeguard PII.
5. Oregon Consumer Information Protection Act (ORS 646A.600 - 628): This act extends protections to consumer privacy by requiring entities to implement security measures to prevent unauthorized access to consumer information, including PII. It mandates that businesses and government entities must follow strict guidelines regarding data retention, access, and destruction to minimize risks of exposure.
6. Data Breach Notification Requirements (ORS 646A.600 - 628): In the event of a data breach involving PII, the state requires prompt notification to affected individuals and the Attorney General if the breach affects more than 250 Oregon residents. The notification must detail what information was compromised and the steps being taken to address the breach, helping to minimize harm and restore privacy protections.
7. Access Control and Audit Policies: Oregon state agencies implement stringent access control policies to ensure that only authorized personnel can access PII. This includes user authentication protocols, logging and monitoring access to sensitive data, and conducting regular audits to ensure compliance with privacy regulations.
8. Public Records Law (ORS 192): While Oregon's Public Records Law promotes government transparency, it also includes provisions for the protection of PII in public records. Sensitive PII, such as Social Security numbers and health information, are exempt from disclosure to ensure consumer privacy.

9. The Oregon Cybersecurity Framework (OCSF) and NIST SP 800-53 guidelines further enhance security through risk management, regular audits, and incident response protocols.

44. Provide documentation of the processes to monitor, identify, and address security and privacy threats.

☒ Defer response to State Implementation Blueprint.

The State of Oregon implements comprehensive processes to monitor, identify, and address security and privacy threats in accordance with its legal and regulatory framework. These processes ensure that Personally Identifiable Information (PII) and other sensitive data are safeguarded against unauthorized access, data breaches, and other security threats.

1. Processes and Procedures for Monitoring Data Security and Identifying Breaches

The State of Oregon follows a continuous and real-time monitoring approach for all state IT systems, networks, and databases that handle sensitive data, including PII. Under the Oregon Statewide Information Security Policy (Policy 107-004-020), all state agencies must utilize security information and event management (SIEM) tools to monitor for suspicious activity and potential security breaches. Monitoring includes the use of intrusion detection systems (IDS), firewalls, encryption technologies, and multi-factor authentication (MFA) protocols to prevent unauthorized access. State systems are continuously monitored 24/7, and logs are regularly reviewed to detect anomalies, unauthorized access attempts, or unusual data movements. Regular vulnerability assessments and penetration testing are conducted to proactively identify weaknesses in state systems. The Oregon Enterprise Security Office (ESO) performs periodic audits to ensure compliance with state policies.

Oregon state agencies are required to have an incident response plan in place, as per ORS 646A.600 - 646A.628 (Oregon Consumer Information Protection Act). This policy outlines the procedures for identifying, responding to, and mitigating security breaches involving PII. When a breach is identified, the state follows a defined Incident Response Procedure that includes immediate notification to the relevant authorities, including the Oregon Chief Information Security Officer (CISO). Affected systems are isolated and secured to prevent further data exposure. A root cause analysis is conducted to identify the source of the breach and prevent recurrence.

2. Training Contractors and Entities Handling PII in Data Privacy and Security

All contractors and third-party entities that handle state data, including PII, are required to undergo mandatory data security and privacy training before being granted access to state systems. Under the Oregon Statewide Information Security Policy, this training covers:

- Proper handling, storage, and transmission of PII in compliance with state and federal laws.
- Best practices for securing PII, including encryption, access control, and secure data disposal procedures.
- Incident response training to ensure contractors know how to report and handle a data breach.

Contractors are required to adhere to state standards outlined in the Oregon Identity Theft Protection Act and Oregon Consumer Information Protection Act. They must implement data protection measures consistent with state policies, such as encrypted communication channels, secure login protocols, and physical security for devices handling sensitive data.

3. Addressing Privacy or Data Breaches

In the event of a data breach involving PII, the state follows the Oregon Data Breach Notification Law (ORS 646A.600 - 646A.628). This law requires notification to affected individuals within 45 days of discovering the breach, unless law enforcement advises that notification would impede a criminal investigation. Notification must also be provided to the Oregon Attorney General if the breach affects more than 250 Oregon residents. The notification will detail the type of information compromised, the steps taken to mitigate the breach, and recommendations for protecting personal information (e.g., changing passwords, freezing credit reports). The state works to quickly mitigate the impact of a data breach by securing compromised systems and restoring services with updated security patches and offering identity theft protection services to affected individuals, including credit monitoring and identity theft insurance.

4. Standard Operating Procedures (SOPs) and State-Required Procedures

- Statewide Information Security Policy (Policy 107-004-020): This policy mandates the application of a robust security framework, covering data encryption, access controls, monitoring, and incident response protocols. All state agencies are required to implement these SOPs to ensure data security.

- Data Classification Policy: Oregon uses a data classification policy to categorize information based on its sensitivity, ensuring that PII is labeled as “confidential” and subject to enhanced security measures, such as encryption and restricted access.

- Oregon Administrative Rules (OAR Chapter 125-800): These rules require state agencies to follow defined protocols for securing electronic PII, including physical security for devices, encryption, and secure data destruction processes. SOPs are also in place for reviewing and updating security policies annually to address new risks.

- Audit and Compliance: State agencies must comply with regular security audits and assessments conducted by the Oregon Enterprise Security Office (ESO) to ensure adherence to policies and procedures for protecting sensitive data. Audit findings are used to improve security measures and remediate identified vulnerabilities.

45. Confirm that the State will require billing data release and describe how the State will gain access to billing data for program requirements and program evaluation.

☒ Yes, the State confirms the above statement.

☒ Defer response to State Implementation Blueprint.

To model a project's projected home energy savings, the household's utility ratepayer will be responsible for accessing the household's energy use data and submitting it to their selected contractor or to the rebate processing system directly. To be approved for a rebate, the household's utility ratepayer will be required to agree to the program's terms and conditions, which will include a requirement for the utility ratepayer to release billing data from their metered fuel utilities to the state for evaluation purposes. Terms and conditions will also include a requirement that the homeowner and utility ratepayer will be willing to participate in monitoring and evaluation activities such as surveys and interviews, if selected.

Upon receiving a post-installation energy use data request from USDOE, ODOE will email the households selected for evaluation, requesting that the households' utility ratepayers submit the most recent 12 months of their utility use data. Households will be given up to four weeks to respond, and ODOE will send up to two follow-up emails to non-responsive households. After the four-week deadline has passed, ODOE will send the combined dataset to USDOE.

46. Confirm that the State will collect the required data and cooperate in program evaluation processes as listed in section 3.1.6.3.

☒ Yes, the State confirms the above statement.

47. Confirm if the State is planning to conduct its own evaluation, and if so, what type(s) of evaluations.

☐ Yes, the State is planning to conduct its own evaluation. (Describe types of evaluations).

If yes, confirm that the State will:

- Cooperate with DOE to meet all the requirements listed in section 3.1.6.3.

☐ Yes, the State confirms the above statement.

- Submit an evaluation plan for DOE review within three months of program launch.

☐ Yes, the State confirms the above statement.

- Provide results to DOE.

☐ Yes, the State confirms the above statement.

☒ N/A. The State does not plan to conduct its own evaluation.

48. If the State plans to conduct evaluations on its programs, describe the evaluation objectives, high level work plan, and timing of the evaluations and whether the State would request to be excluded from DOE-led evaluations.

☐ Defer response to State Implementation Blueprint.
☒ N/A. The State does not plan to conduct its own evaluation.

Consumer Experience

Section 3.2.1: Outreach and Education Strategy

49. Confirm that the State will develop and submit an outreach and education strategy consistent with section 3.2.1

☐ Yes, the State confirms the above statement and will include it with this narrative document.
☒ Yes, the State confirms the above statement but defers a response to State Implementation Blueprint.

Section 3.2.2: Home Assessments

50. Describe the processes and procedures for conducting home assessments that meet program requirements.

☒ Defer response to State Implementation Blueprint.

Overall Requirements

As part of our program guidelines and written into our contractor participation agreements, the state will require every HOMES project to receive an assessment that meets DOE requirements. These assessments will be conducted consistent with Section 3.2.2 of the Program Requirements and Application Instructions as well as the Data and Tools Requirements Guide. Detailed guidance for completing a home assessment will be posted to the programs' website prior to launch. This guidance will include requirements for what information must be provided to the state and the homeowner or building owner (e.g., a scope of work, total cost, and expected energy and cost savings). The program implementers will also provide onboarding, training, and tools to enrolled contractors. Enrolled contractors will receive home assessment checklists that list the minimum data collection requirements.

Single-family Requirements

The home assessment protocol for single-family modeled energy savings projects will adhere to all requirements contained in the latest versions of DOE guidance. Assessment tools will concurrently generate a Home Energy Score (HES) model and prioritized recommendations, as well as a Home Energy Score for integration into the project certificate. All assessment data will adhere to the HPXML v3 specification and therefore allow seamless transfer to the Home Energy Score Tool.

Entities providing a Home Energy Score (Assessors) will be required to meet the training and qualifications of Oregon's Home Energy Score program. This includes obtaining and verifying qualifying technical credentials and completing the online Home Energy Score training and passing the online test. Oregon's Construction Contractors Board (CCB) verifies eligibility through the issuance of a Home Energy Assessor certificate. Assessors in the HOMES and HEAR program will be required to secure a CCB certificate. The Implementers will work with Assessors to ensure that data collection is consistently measured and meets Home Energy Score requirements (e.g., derating of insulation based on installation, definition of square footage, etc.). Home Energy Scores will also be used for single-family modeled projects that require an exemption (see response to Question #59).

Multifamily Requirements

See response to Question #52.

51. Describe how home assessment data and results will be verified for accuracy.

☒ Defer response to State Implementation Blueprint.

Our program's Quality Assurance and Quality Control (QA/QC) protocols will include the following elements:

- Approved assessment and data collection tools will include data validation checks and constraints to minimize data entry mistakes. These basic checks will be on both the input and the output side.
- Every project will include a desk review by one of our implementers.

- Implementers will conduct third-party on-site QC on the first assessment completed by each newly onboarded contractor. Existing contractors will be exempt from this requirement.
- For projects that require an on-site post-installation inspection, implementers will verify the assessment data, as feasible.
- The state will compare data submitted across contractors to detect outliers and potential problems with assessments. At a minimum, this will be conducted no later than one year after program launch.
- Contractors or Assessors who are flagged due to data collection anomalies or concerns will be required to take additional training on conducting assessments and/or shadow other contractors to learn best practices.

52. Describe what processes will be put in place for home assessments for multifamily buildings, including for energy used by common areas.

☒ Defer response to State Implementation Blueprint.

As with single family buildings, prior to launching the program, the state will develop requirements for what must be included at a minimum in all multifamily assessments for the HOMES program. For smaller multifamily complexes, where allowed by the HES tool (i.e. each unit has dedicated HVAC systems and separate exterior egresses, and no shared equipment or spaces would receive or benefit from the proposed upgrades), the state will allow the use of the HES tool to meet the assessment requirement, though an assessment will be required for each unit. When modeling is required for buildings that use the HES tool for assessments, the state will allow for use of USDOE-approved single-family and multifamily modeling software.

For multifamily projects where HES cannot be used – i.e. buildings that have shared equipment and common areas – Oregon will require an ASHRAE Standard Level II energy audit that includes this equipment. ASHRAE Level II audits are consistent with DOE's requirements for home assessments and reporting of home assessment data. The state will also review assessment protocols used by utility programs to inform any additional requirements or state level customization to the USDOE-provided audit template and standardized spreadsheet. The state will publish the multifamily building assessment requirements and provide these to all contractors on the enrolled contractor list. Any required modeling will be run using software approved by DOE. The ASHRAE Level II audit data must be reported in BuildingSync or in a spreadsheet format. All required assessment and modeling data will be collected and stored in the programs' rebate management system.

Section 3.2.3: Access to Residential Utility Data

53. Confirm that the state will develop and submit a Utility Data Access Plan consistent with the program requirements in Section 3.2.3.

☐ Yes, the State confirms the above statement and will include the plan with this narrative document.

☒ Yes, the State confirms the above statement but defers a response to State Implementation Blueprint.

Section 3.2.4: Project-Specific Energy Savings Calculations

54. Confirm if the State will implement the modeled path, measured path, or both.

☒ The State will implement the Modeled program path.
☐ The State will implement the Measured program path.
☐ The State will implement both the Modeled and Measured program paths.

Section 3.2.4.1: Calculating Modeled Energy Savings

55. Identify what factors the State will use to calculate kWh equivalent, consistent with section 3.2.4.1.

☐ Defer response to State Implementation Blueprint.
☐ N/A. The State is not implementing the modeled program path.

Modeled energy savings will be based on site energy. For homes using non-electric energy sources, the state will apply the following standard conversion factors noted in the chart below:

Fuel	Measured Energy Rate	Conversion to kWh
Natural Gas	Therm	kWh = therm * 29.3
Propane	Gallon	kWh = gallons * 26.8
Fuel Oil	Gallon	kWh = gallons * 43.9

Note that the state intends these conversions to be the very last step in estimating energy savings and will likely track savings in the measured energy units for reporting out in purposes other than tracking for USDOE.

56. Describe the energy savings objectives and overall approach for estimating energy savings for the modeled program path.

☐ N/A. The State is not implementing the modeled program path.

Objectives:

- Maximize energy savings through targeting home characteristics and high energy bills.
- Focus on envelope improvements and heat pump installations.

First, the state wants building owners to get good advice regarding the types of improvements that make sense for their homes, including how different measures will affect utility bills, comfort, indoor air quality, moisture, and others. To that end, the state will require contractors to model energy savings attributable to envelope improvements for homes with existing conditions that are less efficient than state-established envelope efficiency minimums (e.g., insulation R values).

Second, the state wants the modeled energy estimates to be in line with the actual energy savings realized after the improvements are made. Given that the energy model predicts energy savings (which can then be translated into cost savings predictions based on local fuel rates), the state will require contractors to submit their underlying assumptions regarding occupancy and occupant behavior (e.g., set points).

Oregon's overall approach for estimating energy savings for the modeled program path is to use BPI-2400 certified software for single-family, as approved by DOE, to model energy savings with bill calibration wherever possible, and Home Energy Score where bill calibration is not possible.

The state will require contractors to provide an estimated range of energy savings and utility bill impacts in the information that they provide to residents or building owners prior to beginning the work so that they have a better idea of potential impacts. To ensure the accuracy of the modeling results, program implementers will also compare a sample of contractors' energy models with results obtained from running the modeling inputs through the standardized Home Energy Scoring Tool (which already applies conservative assumptions regarding occupancy, occupant behavior, air leakage, etc.).

57. Describe which upgrades may be included in the modeled savings estimate, including at least one major upgrade as defined in section 2.1, including a brief description of if the state will or will not require the installation of envelope prior to other upgrades.

☒ Defer response to State Implementation Blueprint.

☐ N/A. The State is not implementing the modeled program path.

For the purposes of modeling energy savings, Oregon will only allow inclusion of upgrades that are consistent with BPI-2400; these include HVAC improvements, water heating, and envelope improvements. The state will not allow upgrades to portable lighting (e.g., changing out light bulbs) or plug load improvements to count toward the energy savings calculation.

When a home's baseline envelope conditions are insufficient, contractors will be required to propose envelope improvements (i.e. air sealing, duct sealing, window attachments, fenestration upgrades, and insulation) to the homeowner or building owner. Prior to launching the program, the state will work with experts (e.g., DOE, national labs) to establish pre-condition thresholds to inform contractors' recommendations for improvements.

The state recognizes that some residents or building owners may not wish to expend resources on certain improvements; however, the state will require contractors to run at least one comparative model that includes envelope improvements to demonstrate how different options are likely to affect energy use, utility bills, and, where applicable, HVAC system sizing. Contractors will be required to submit a copy of the comparative model to the building owner as well as to the project's record in the state's rebate processing system. The state will also require contractors to provide standard information regarding how a home's conditions interrelate and how the envelope can affect comfort, moisture, etc.

58. Identify which modeling tools the State proposes to authorize for its program. Identify whether any proposed tools have not yet received DOE approval.

☒ Defer response to State Implementation Blueprint.

☐ N/A. The State is not implementing the modeled program path.

For single-family projects, the state plans to allow the use of the following DOE-approved modeling tools: Snugg Pro and OptiMiser.

59. Describe how the State will monitor the energy savings reliability of models and tools for the modeled program path.

☒ Defer response to State Implementation Blueprint.

☐ N/A. The State is not implementing the modeled program path.

To monitor the savings reliability of energy models, program implementers will conduct QC reviews of all models submitted to the program. This QC check will include reviewing the data inputs, modeling procedures, results, and recommendations to the homeowner. This QC check may include reviewing photographic documentation of existing conditions or conducting an independent assessment of home characteristics. These results and feedback will be provided to contractors as needed.

For modeled projects, as part of the quality control process, the implementer will identify corrections based on actual home or project characteristics if they are different from the original inputs as reported by the contractor. The contractor will be required to update inputs and resubmit models based on corrections or substantive change orders that impact energy performance. The program will continuously make improvements to the curriculum and provision of trainings, clarification of program rules, and technical support provided to contractors.

At least once per year, implementers will select a sample of projects to compare contractors' energy models with results from running the modeling inputs through the standardized Home Energy Scoring Tool as an additional resource for quality control.

60. If the State plans to allow modeling for homes for which BPI-2400 is not applicable or that are not eligible for BPI-2400, request alternative modeled path(s) by:

    - Detailing for which exceptions the State plans to apply the alternative approach (e.g., multifamily, lack of delivered fuel bills, etc.).
    - Providing a detailed description of the method(s) that the State will use to estimate energy savings for each exception and how the State will ensure consistency between the alternative method and the results of BPI-2400 such as a realization rate adjustment to be used in reported savings estimates.
    - Commit to carrying out evaluations upon thresholds listed in section 3.2.3.1.
    - Describe how the State will use any evaluation results or new information to update and adjust its alternate savings modeling method.

☒ Defer response to State Implementation Blueprint.

☐ N/A. The State will not allow modeling for homes for which BPI-2400 is not applicable or that are not eligible for BPI-2400.

Consistent with the DOE program requirements and BPI-2400, the state will require contractors to calibrate their models to historical energy consumption data. However, Oregon will not require calibration for the following types of projects:

- Homes with delivered fuels
- Renter/homeowner attests they cannot locate recent bills or access the data from their utility
- Where occupants have lived in the home less than one year
- Multifamily homes
- Sites with onsite generation where the energy consumption data cannot be separated from the energy produced. However, we expect that forthcoming changes to BPI 2400 should enable model calibration of homes with onsite generation, and so these projects may not need to be excluded.
- Homes with large data anomalies (such as a home that is a primary residence but is unoccupied for large periods of time)

For single family projects, and some multifamily projects, non-calibrated models will be produced using the Home Energy Score. Because this tool is consistent with BPI-2400 Annex E, the state will not use a realization rate or conduct additional evaluation. For larger or more complex multifamily projects, non-calibrated models will be produced using ASHRAE Standard Level II energy audit.

61. For multifamily, describe the methods used for modeling energy savings for multifamily buildings, including energy used in common areas.

☒ Defer response to State Implementation Blueprint.

☐ N/A. The State is not implementing the modeled program path.

Oregon will utilize the home assessment data collected while performing ASHRAE Level II audits using Audit Template and will generate energy models using software tested to ASHRAE standard 140-2007 and is included in DOE's approved software list. The state will require standard use assumptions for common areas unless the modeler provides rationale for applying other assumptions. Pre- and post-diagnostics, engineering review, and quality control will be performed consistent with the actions detailed for single family sites.

Section 3.2.4.2: Calculating Measured Energy Savings

62. Describe the energy savings objectives and overall approach for estimating and measuring energy savings at the home and if applicable, portfolio of homes.

    ☒ N/A. The State is not implementing the measured program path.

63. Identify what factors the State will use to calculate kWh equivalent, consistent with section 3.2.4.1.

    ☐ Defer response to State Implementation Blueprint.

    ☒ N/A. The State is not implementing the measured program path.

64. List the open-source advanced M&V software(s) the State requests to use and confirm that each meets program requirements.

    ☐ Defer response to State Implementation Blueprint.

    ☒ N/A. The State is not implementing the measured program path.

65. Describe how the State will monitor and ensure that aggregator portfolios meet the program requirements and minimum savings thresholds for the measured program path.

    ☐ Defer response to State Implementation Blueprint.

    ☒ N/A. The State is not implementing the measured program path.

66. If measuring energy savings within a period of less than 12 months, describe how the State will define and enforce the inclusion of peak seasons.

☐ Defer response to State Implementation Blueprint.

☒ N/A. The State will measure energy savings over at least 1 year or the State is not using the measured savings approach.

67. Describe the State's processes for measuring savings for multifamily buildings, including for energy used by common areas.

☐ Defer response to State Implementation Blueprint.

☒ N/A. The State is not implementing the measured program path.

Section 3.2.5: Consumer Protection through Quality Assurance

68. Certify that the State will prepare and implement a Consumer Protection Plan in accordance with the requirements (Section 3.2.5) and that the State rebate program will not launch until receiving DOE approval.

☒ Yes, the State confirms the above statement.

Section 3.2.6: Post-Installation Certificate

69. Describe how each of the certification requirements (Section 3.2.6) will be met for single-family homes.

☒ Defer response to State Implementation Blueprint.

The Completion Certificate includes, at a minimum:

- A list of all work performed, including details of installed equipment and materials
- Projected energy savings to support the accurate valuation of the upgrade
- Estimated annual energy use and costs as provided to household during the home assessment, updated based on final project scope
- Additionally, the following will be included with the Completion Certificate, as appropriate for the work:
  - The final paid invoice with incentive information
  - Warranty information
  - Equipment owner manual(s)
  - Home Energy Score or Energy Audit
  - Consumer protection information

The state will use the Home Energy Score (or Energy Audit) to supplement each post-installation project certification. The Home Energy Score explains the benefits of the home features in language that homeowners and potential buyers can understand. The program will implement regular audits and oversight to ensure adherence to the established guidelines, maintaining the integrity of the certification process.

The state will create clear instructions for the implementers when delivering the Completion Certificate, including what they must confirm and verify with respect to each project and how to ensure the certification is provided to the household. Upon approval of a HOMES rebate reservation, the implementer will provide the Completion Certificate to the installer, to be delivered to the homeowner or building owner, in person, upon completion of the installation.

The certificate or a cover page accompanying it will include the DOE logo (per DOE usage guidelines) and recognition that the work performed was funded in part (or in full) through Home Energy Rebates provided under the Inflation Reduction Act of 2022. The state will provide a mock-up of these materials to DOE for review prior to launch.

70. Describe how each of the certification requirements (Section 3.2.6) will be met for multifamily buildings.

☒ Defer response to State Implementation Blueprint.

All multifamily residential units will receive a completion certification that documents and certifies the upgrades. The Completion Certificate includes, at a minimum:

- A list of all work performed, including details of installed equipment and materials
- Projected energy savings to support the accurate valuation of the upgrade
- Estimated annual energy use and costs as provided to household during the home assessment, updated based on final project scope.
- Additionally, the following will be included with the Completion Certificate, as appropriate for the work:
    - The final paid invoice with rebate and other incentive information
    - Warranty information
    - Equipment owner manual(s)
    - Home Energy Score or Energy Audit
    - Consumer protection information

For projects that completed the assessment requirement using the Home Energy Score, the score will be included with the completion certificate. In cases where a Home Energy Score is not applicable to the building configuration or insufficiently capable of reflecting the full array of energy improvements (e.g., energy upgrades to building common spaces), then an ASHRAE Level II Audit document will be included with the certificate. ASHRAE Level II Energy Audits must be completed by certified energy professionals whose qualifications meet ANSI/ASHRAE/ACCA standard 211-2018.

Because our program implementers will not complete project installations and they are not compensated based on savings results, they will serve as the qualified third-party certifier. The state's program guidelines will include clear instructions to certifiers on what program certifiers must confirm and verify with respect to each project and how to provide the certification to the household. It will also describe the minimum qualifications of certifiers.

To further inform households within a multifamily building, the owner will be required to post (for no less than 6 months) the certification in a public place within the multifamily building (e.g., entry, regularly used common space). The certificate will be completed by the implementers and provided to the installer.

71. Identify which third-party certificate(s) the State program will offer to homeowners that receive a rebated home energy upgrade.

☒ Defer response to State Implementation Blueprint.

The state and its implementers will use the Home Energy Score Tool to provide a certificate to households. The implementer will provide the certificate to the installer who will deliver the certificate and accompanying information to the building owner upon completion of the installation. In cases where a Home Energy Score is not applicable to the building configuration or insufficiently capable of reflecting the full array of energy improvements (e.g., energy upgrades to building common spaces), then an ASHRAE Level II Audit document will supplement the certificate and validate the energy savings and annual energy use.

Maximizing Rebate Impact

Section 3.3.1: Supporting the Clean Energy Economy Through Market Transformation

72. Certify that the State will develop and implement a Market Transformation Plan within the first year after receiving the financial assistance award.

☒ Yes, the State confirms the above statement.

Section 3.3.2: Integrating with Other Programs

73. Identify whether the State plans to take proactive steps to encourage integration with other programs. If so, identify with which programs the State will actively seek to integrate. The State may include letters of support or other indicators of commitment from existing program partners. Applications should identify whether programs will be integrated in any or the following areas:
   - Integration into existing program administration, website, materials.

- Adoption of existing program standards, QA, workforce standards, or other practices.
- Braiding or co-funding of upgrades within individual households.
- Other integration elements, as applicable.

☒ N/A. The State does not plan to integrate the rebates into any existing programs.

Oregon does not plan to formally integrate the rebates into any existing programs. However, Oregon will use the following channels to help homeowners and building owners access additional funding opportunities:

1. In investor-owned utility service areas, Energy Trust will be responsible for integrating HOMES in its existing rebate offerings, where applicable.
2. In consumer-owned utility service areas, the implementer will be required to contact the household's utility provider or energy efficiency program administrator to notify them that the household has qualified for a rebate. This will allow the utility/program administrator to inform the implementer of any additional program opportunities in their service areas.
3. Oregon has created a one-stop-shop to inform consumers and contractors about available funding opportunities. The one-stop-shop is a web resource that uses location and income information to identify energy efficiency programs a household may be eligible for. Homeowners can access this tool themselves, or it can be used by contractors to estimate potential incentives for a household.

74. Describe how the State program will support households, contractors, aggregators, and other stakeholders in understanding how the State program may leverage other program resources.

☐ Defer response to State Implementation Blueprint.

In 2023, in anticipation of the HOMES and HEAR programs, the Oregon Legislature directed the Oregon Department of Energy to establish a "single resource" to help people understand the various energy efficiency rebates available, and to provide education and other information related to energy efficiency and leveraging across varied programs. The agency recently hired IT staff to plan for this single resource, and various staff across the agency will work to create informational and educational resources that will be available as part of that resource. ODOE's goal is to launch this collection of tools alongside the launch of HEAR (and/or HOMES) and then continue to enhance the resource over time.

75. Describe the method(s) the State will use to ensure the total combination of all immediate upfront funding sources (Federal grants, Federal loans, and non-Federal funding) provided to a project does not exceed the total project cost.

☒ Defer response to State Implementation Blueprint.

The state will educate contractors and consumers regarding the restriction of applying incentives that exceed total project cost. To be included on the list of approved contractors, contractors will be required to participate in a training that explains the restrictions on braiding and the restriction that total upfront incentives cannot exceed the total project cost. In addition, before a rebate reservation is approved, building owners will be required to confirm that they have read and understand the following statement:

A building owner is not eligible to receive HOMES rebate funds that exceed the total project cost after any other rebates or incentives are applied. A building owner must inform their contractor of all other incentives that they have received or will receive for the project.

Contractors will be instructed to apply HOMES rebates toward any remaining costs that are not covered by the other incentives. The HOMES rebate percentage will apply to the total cost of the project, before other incentives are applied; rebate reservations will only be approved for an amount that does not exceed the total project cost that includes all other incentives. The final customer invoice must list all applied incentives. The invoice – which must be signed by the building owner – must include a statement that says the building owner did not receive funding in excess of the total project costs.

When a HOMES rebate application is submitted, implementers will check to determine whether the address and project scope have already been approved for the same measure(s) through the HEAR program. If a HOMES project has already received a HEAR rebate for the same measure(s), implementers will follow up with the applicant to correct the issue or else deny the application.

76. Describe how the State program will support contractors and retailers in preparing acceptable invoices that may be kept as program records.

☒ Defer response to State Implementation Blueprint.

Oregon will create detailed guidance for contractors to use to ensure their invoice has all the required elements. As described in the CPP, contractors will be required to participate in mandatory trainings to be added to the approved contractor list; such trainings will include tutorials on how to prepare acceptable invoices. All these resources will be available on the program's website.

77. Describe how the State implementer(s) will produce invoice documentation in a timely manner upon request in the event of an audit by DOE, the DOE's Inspector General, a State's inspector general, or another entity.

☒ Defer response to State Implementation Blueprint.

The state's rebate processing system will require contractors to submit invoices as PDFs. In the event of a U.S. DOE audit or a request from a legitimate entity, ODOE will download the requested invoices from the rebate processing system and send them to the entity via a secure file transfer method.

78. Describe how the State will ensure rebate recipients will be made aware of the portion of the funding received from the DOE Home Efficiency Rebates.

☒ Defer response to State Implementation Blueprint.

Contractors will be required to provide a line item for "DOE Home Efficiency Rebates" on both customer invoices and project scopes, which must include the level of rebate applied, including the rebate amount and percentage. Final invoices must be signed by the building owners before contractors may receive reimbursement.

Section 3.3.3: Quick Starts

79. Identify whether the application is for a Quick Start program. For Quick Start programs, identify the timeline for program launch.

☐ Yes, this is for a Quick Start Program (provide timeline below).
☒ No, this is not for a Quick Start Program.

Please add your name, title, signature, and date.

____
Name (printed)

____
Organization and Title

____
Signature

____
Date