

District of Columbia
Department of Energy and Environment

IRA Section 50121 Home Efficiency Rebates
Community Benefits Plan

October 2024

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Introduction

The District of Columbia Department of Energy and Environment (DOEE) will manage roughly \$29 million in federally funded Home Efficiency Rebates (HER) to assist affordable housing buildings with energy efficiency upgrades and electrification.¹

DOEE will use HER to expand the existing [Affordable Housing Retrofit Accelerator](#) (AHRA), a program implemented by the DC Sustainable Energy Utility (DCSEU) that provides technical and financial assistance to owners and managers of qualifying multifamily affordable housing buildings to make their buildings more energy efficient. DCSEU will serve as the implementer for the Home Energy Rebates Programs under contract with DOEE.

This Community Benefits Plan describes how DOEE intends to meet the following objectives in the planning and implementation of the HER program:

- 1) Support meaningful community and labor engagement
- 2) Engage and support a skilled and qualified workforce
- 3) Advance diversity, equity, inclusion, and accessibility (DEIA)
- 4) Contribute to the Justice40 Initiative with the goal that 40% of the overall benefits of certain federal investments flow to disadvantaged communities

DOEE will publish the Community Benefits Plan and progress toward goals (see Summary Table of Goals section) on its website: <https://doee.dc.gov/service/ira-rebates-tax-incentives>.

Engage Community and Labor

Previous and Ongoing Public, Stakeholder, and Labor Engagement

In designing the Home Energy Rebates Programs for the District, DOEE took into consideration local laws and existing plans around reducing carbon emissions, which were informed by public and stakeholder engagement. Some of those laws and plans include:

- The [Healthy Homes and Residential Electrification Amendment Act of 2023](#), which directs DOEE to create a program to electrify homes at no cost to low-income households.
- The [Climate Commitment Amendment Act of 2022](#), which requires District government to adopt policies that achieve carbon neutrality in the city by 2045.
- [Carbon Free DC](#), which recommends developing a strategy to achieve deep energy retrofits² in single-family homes and small multi-family residential buildings, while preserving and expanding the affordability and availability of housing units.
- [Clean Energy DC](#), which recommends providing incentives to implement an energy retrofit program for existing buildings.

¹ Electrification involves replacing home appliances and systems that burn fossil fuels with appliances and systems that are powered by electricity; for example, replacing a gas stove with an induction stove, or a gas-powered furnace with a heat pump for home heating and cooling. Electrification can help reduce harmful greenhouse gas emissions that cause climate change.

² A deep energy retrofit is a whole-building renovation that achieves large reductions in energy use.

Below is a summary of community and stakeholder engagement and public input sessions that informed DOEE's program design for the Home Energy Rebates Programs.

- Between April and July 2024, DOEE received feedback via a form posted on its Home Energy Rebates [landing page](#), collecting several dozen responses from the public about the home energy efficiency and electrification programs. The form was promoted via email and at the Healthy Homes Fair described below. Findings show that cost, lack of knowledge around energy efficiency and electrification, and access to reliable contractors are the biggest challenges District residents face when considering home energy upgrades. Feedback also indicates that DOEE should make the income verification process as easy as possible for residents, help identify reliable and qualified contractors, and assist customers with stacking assistance and incentives from various sources.
- On April 6, 2024, Electrify DC (in partnership with DOEE) hosted the [Healthy Homes Fair](#), a free and public event for homeowners, renters, home renovation professionals, and career seekers to learn about the products and services needed to improve health, increase comfort, and reduce emissions in DC area homes. The event was promoted over social media, distribution lists, and partner organizations, and attracted over 1,000 attendees and 70 exhibitors. DOEE staff engaged over 50 people about the Home Energy Rebates Programs.
- At a January 2024 DOEE environmental stakeholders meeting, DOEE shared a high-level implementation approach for the Home Energy Rebates Programs, including plans to use existing programs to facilitate delivery of rebates, with a focus on low-income households. The approach was well received.
- In 2023 and 2024, DOEE partnered with the International Brotherhood of Electrical Workers (IBEW) Local Union 26 to recruit and train District residents, through pre-apprenticeships and apprenticeships, as journey-level electricians to help the District meet its solar, energy efficiency, and sustainability goals. Residents ranged from underemployed and unemployed residents, women, veterans, District of Columbia Public Schools (DCPS) students, returning citizens, and others in historically excluded communities to increase interest and retention in the building trades. IBEW Local Union 26 will continue this work under the District's Greenhouse Gas Reduction Fund Solar for All award.
- In 2023 and 2024, DOEE grantee the National Housing Trust (NHT) hosted outreach events at three low-income housing properties to introduce the topic of building electrification and enroll residents in focus group discussions. Six 90-minute focus group sessions followed (two at each property) to educate residents on building electrification and hear their subsequent concerns and desires, while compensating them for their valuable time and input. The goals of the sessions were to: 1) amplify District residents' voices and empower them to influence building electrification and decarbonization policies and programs; and 2) develop and implement a pilot community engagement strategy.
- In 2023, DOEE and grantee, Buro Happold, conducted engagement around updating the [Clean Energy DC](#) plan. DOEE and Buro Happold hosted dozens of engagement

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events (listening sessions, focus groups, community and industry meetings, etc.) centering around several energy topics, including building electrification. These events targeted the public and subject matter experts.

- At a May 9, 2023 [legislative hearing](#) for the Healthy Homes and Residential Electrification Amendment Act of 2023, dozens of community members and stakeholders voiced their support for a low-income residential electrification program, including leveraging funding from the Home Energy Rebates Programs for such purposes. The hearing also helped inform the [Affordable Home Electrification Program](#) (AHEP), which helps qualifying households and small multifamily properties transition from natural gas and electrify their homes and buildings at no cost.
- The Building Innovation Hub (Hub) is a non-profit organization that assists building industry professionals in and around the District to create and operate high-performing buildings. The Hub helps connect eligible buildings with AHRA to support their enrollment into the program. The Hub provided detailed one-on-one consulting to under-resourced buildings that struggled to understand their next steps toward compliance with the District's Building Energy Performance Standards (BEPS).
- In 2021, Emerald Cities Collaborative (ECC) studied workforce needs to meet the District's building decarbonization goals. Building from that study, ECC designed and launched the Black, Indigenous, and People of Color (BIPOC) Contractor Incubator in early 2024, which implemented an 8-week training and educational course geared towards a cohort of 25 minority and women-owned businesses in the District. ECC is currently preparing to launch a second cohort of the training program. DOEE provides an advisory role to this project and serves on the advisory board for the Incubator. ECC also provided a workforce ecosystem assessment for DOEE's pending update of Clean Energy DC.
- NHT and the Housing Association for Non-profit Developers (HAND) convened DC affordable housing advocates, developers, and owners to discuss how to implement the District's BEPS in affordable housing. The [ensuing report](#) provided recommendations to DOEE around implementation of BEPS pertaining to the District's multifamily affordable housing owners and developers. This report was foundational to the concept of and design for DOEE's Affordable Housing Retrofit Accelerator (AHRA).
- DOEE convened monthly meetings with representatives of the affordable housing provider community throughout 2020 and 2021 to solicit input and feedback on the development of the BEPS rulemaking and technical/financial assistance programs, with the goal of supporting affordable housing buildings with BEPS compliance. This engagement was foundational to the concept and design for AHRA.
- In 2020 and 2021, DOEE and DCSEU conducted the Low-Income Decarbonization Pilot, which investigated the extent to which decarbonizing homes could reduce energy burdens for the District's low-income residents, while meaningfully reducing greenhouse gas (GHG) emissions. The pilot informed the design of AHEP.

In response to public and stakeholder input, DOEE proposes to do the following in its implementation of the Home Energy Rebates Programs:

- Use Home Efficiency Rebates to exclusively serve eligible multifamily affordable housing buildings;
- Set aside funds for a grantee (subrecipient to be determined) to conduct education and outreach on the technologies and benefits of energy efficiency and electrification, with a focus on engaging low-income and disadvantaged communities;
- Allow households and building owners to income qualify for rebates based on enrollment in other pre-approved programs; and
- Ensure maximum coordination with DOEE's federal Training for Residential Energy Contractors (TREC) award to upskill existing residential home energy contractors and maximize access to qualified contractors.

Planned Household Engagement

DOEE will build on previous and ongoing engagement efforts. As described in the Education and Outreach Plan, DOEE will bring on a grantee to conduct outreach and education around energy efficiency and electrification, with a focus on low-income and disadvantaged communities. The goals of this engagement (which may be conducted through social media, surveys, flyers, focus groups, demonstration or other events, tabling, and other mechanisms) include:

- Educating residents about the general benefits of energy efficiency and electrification;
- Soliciting concerns around implementation of energy efficiency and electrification projects;
- Increasing awareness about DOEE and the District's climate and energy programs and goals;
- Providing multiple methods for residents and stakeholders to share input on the Home Energy Rebates Programs. Feedback provided as part of this engagement will be incorporated into the program. Specifically, DOEE staff will convene regularly to discuss broad themes or issues identified across engagement efforts and propose solutions, or evaluate recommendations from the public, to address deficiencies, poor performance, and/or other feedback. DOEE will convey program changes and improvements to DCSEU via regularly scheduled meetings and regularly monitor the implementation of these changes and improvements.

Engaging with the tenants of multifamily buildings that undergo electrification and deep energy retrofits is critical to equitable implementation. Such engagement will be facilitated by a grantee, in coordination with DCSEU and the building owner/manager, and will take place in a sample of AHRA-participating buildings. Pre-retrofit engagement will prepare residents for the pending upgrades and provide them with a mechanism for sharing feedback, while post-retrofit engagement will train residents on how to use and maintain new equipment (if applicable) and provide an opportunity to discuss building and utility bill changes with program implementers. DOEE anticipates that in most cases, as overall energy use decreases, utility costs will also decrease. However, there may be shifts in utility billing as part of a building's participation in AHRA; for example, if electric metering shifts from a master meter for the building to individual meters in each unit. In such cases, DOEE may provide information on or aim to enroll tenants in utility assistance programs.

In addition to the goals identified above, the goals of tenant engagement include:

- Providing a courtesy notice of changes residents will experience because of rebate-supported work, and
- Providing a method for residents to share feedback on the specific upgrades to DOEE and DCSEU. DOEE will review this feedback on an ongoing basis to identify patterns, themes, and/or recommendations from tenants of participating buildings. This feedback will be incorporated into continuous program improvement via regularly scheduled meetings among DOEE staff and between DOEE and DCSEU.

To the extent practicable, any in-person events will be held in the neighborhoods/places where low-income households and members of disadvantaged communities live, work, and/or visit. To maximize opportunities for engaging the target populations, DOEE staff working on the Home Energy Rebates Programs will also leverage existing in-person events or engagement efforts organized by other assistance programs within the agency.

DOEE and DCSEU will continue to foster partnerships and work with non-profit and community-based organizations (such as, but not limited to, the ones described in the Previous and Ongoing Public, Stakeholder, and Labor Engagement section) to ensure outreach to and engagement of disadvantaged communities. Additional details on planned outreach can be found in the Education and Outreach Plan.

Planned Labor Engagement

DOEE will continue to engage labor unions located in the Washington, DC metropolitan region that work in commercial and multifamily building trades, such as, but not limited to, IBEW Local Union 26 and the Baltimore-DC Metro Building Trades Council. This engagement will include promotion of training opportunities, as applicable, and requests for input on workforce development policy and programs, including standards, certifications, and recruitment.

DCSEU will continue to engage residential energy contractors, including those within its existing network and via the Department of Small and Local Business Development (DSLBD). This engagement will include promotion of training opportunities, as applicable, and the request for qualifications (RFQ) to develop the qualified contractor list. DCSEU has conducted one-on-one meetings with contractors currently participating in AHRA to better understand contractor capacity and to solicit input on the program. Moving forward, DCSEU will continue such conversations for continuous program improvement. DCSEU will review feedback on an ongoing basis to identify patterns, themes, and/or recommendations from residential energy contractors and convey this feedback to DOEE via regularly scheduled meetings. DOEE and DCSEU will propose and evaluate potential program improvements as they relate to contractor recruitment, onboarding, performance, and retention based on the risk to the program of no action, feasibility of implementation (including costs), and the expected level of improvement.

Additional details on planned labor outreach can be found in the Education and Outreach Plan.

Supporting a Skilled and Qualified Workforce

To participate as a qualified contractor under the Home Efficiency Rebates program, contractors must adhere to the District's labor laws, permitting and insurance requirements, and safety and other standards specified by DCSEU, which will be managing the qualified contractor list and overseeing the work performed by contractors. As part of the RFQ process that DCSEU will use to identify qualified contractors, applicants will be asked to provide information that demonstrates their knowledge, experience, and skill in a particular trade. Contractors will also be asked to provide information on the education and training opportunities offered to workers and will be rated accordingly. Contractors that are highly rated based on a range of factors will be added to the qualified contractor list and become a DCSEU subcontractor. For more information on the RFQ process and contractor qualifications, see the Consumer Protection Plan.

The District of Columbia Living Wage Act of 2006 requires government contractors and grantees receiving more than \$100,000 from the District Government to pay affiliated employees a living wage. Under its contract with DOEE, DCSEU is required to pay its employees and subcontractors who perform services under the contract no less than the current living wage published on the Office of Contracting and Procurement's [website](#). Effective July 1, 2024, the living wage and minimum wage in the District is \$17.50 per hour.

DCSEU will conduct outreach to contractors and unions to make them aware of the Home Energy Rebates Programs and contractor qualifications. DCSEU will host onboarding training for contractors that are new to the program, along with ongoing sessions to ensure contractors are following required processes and procedures, such as data reporting. Training will be provided online, in the classroom, and "on the job" to ensure contractors are continuously developing the skills necessary to remain competitive in residential energy contracting.

DOEE plans to use roughly \$1 million in federal [Training for Residential Energy Contractors](#) (TREC) funds to expand the DCSEU's [Train Green Sustainable Energy Infrastructure Capacity Building and Pipeline](#) program ("Train Green"). DOEE has funded DCSEU to operate this program since 2020. Under Train Green, participants select their desired training pathway and pursue relevant credentials or certification to enable their participation in the local green economy, including in residential energy contractor jobs. Between October 2022 and September 2023, 215 unique individuals registered to participate in Train Green programs, earning a total of 91 credentials or certifications.

The TREC funding will help support Train Green by upskilling incumbent workers, offering new trainings, expanding marketing and recruitment, increasing opportunities for credentials and certifications, and ultimately facilitating connections between residential contractors and the District's Home Energy Rebates Programs, with a focus on recruiting contractors from disadvantaged communities.

DCSEU has also operated a workforce development program since 2014, through which it partners with local companies and organizations to mentor and provide on-the-job training to District residents. Each year, DCSEU works with two cohorts of externs placed with local companies that are active in the green economy, providing externs with a living wage and weekly training that may lead to certifications. Between October 2022 and September 2023, the program worked with 13 mentor organizations hosting 38 externs. Of these, 35 obtained full-time employment in the green economy after graduation. DCSEU will continue to leverage this workforce development program to train and mentor residential energy contractors.

Incorporate Diversity, Equity, Inclusion and Accessibility (DEIA)

As described in the Planned Household Engagement section, DOEE will bring on a grantee to conduct outreach and education around energy efficiency and electrification, with a focus on low-income and disadvantaged communities. As part of the request for applications, DOEE will incorporate experience working collaboratively with disadvantaged and traditionally underrepresented communities into the scoring criteria.

Using TREC funding, DOEE and DCSEU propose to expand marketing and outreach for the current Train Green program, as well as support contractors in recruiting employees from disadvantaged communities. DCSEU will expand outreach activities by coordinating with community-based organizations that have a track record of serving underrepresented populations or disadvantaged communities to advertise opportunities and identify community members that may be interested in participating in Train Green. Wraparound services and training will be provided at no cost to contractors from disadvantaged communities.

DCSEU will also continue to work with inclusive training organizations, such as, but not limited to, Emerald Cities Collaborative, to continuously improve DCSEU training and co-market business development and capacity-building opportunities that target contractors from underrepresented populations or disadvantaged communities.

Address the Justice40 Initiative

DOEE is allocating 100% of Home Efficiency Rebates funds to deliver a rebates program serving qualifying multifamily affordable housing properties. In the context of the Home Energy Rebates Programs, DOEE defines disadvantaged communities as the [census tracts in the District identified as disadvantaged](#) in the federal Climate and Economic Justice Screening Tool. To ensure that rebates are delivered to disadvantaged communities, DCSEU will offer contractors an incentive of \$200 per unit for work completed in a disadvantaged community, which will be tracked and paid by DCSEU. In addition, DCSEU has budgeted additional funds to conduct education and outreach to and recruitment of affordable housing building owners/managers located in disadvantaged communities, and their tenants. Such outreach and promotional efforts may be conducted in partnership with the grantees described in the Planned Household Engagement section and/or in partnership with trusted community-based organizations, such as, but not limited to, those DOEE and DCSEU currently work with or have previously worked with.

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DOEE will ensure applicable benefits flow to disadvantaged communities by requiring tracking and reporting from DCSEU on projects and performance. DOEE will use project and performance information to track progress toward the Justice40 goal of delivering at least 40% of program benefits to disadvantaged communities. If DOEE finds that the target is consistently unmet, DOEE will instruct DCSEU to additionally direct resources toward recruitment of buildings located within these communities.

DCSEU will collect data on each rebate project, including the location, contractor, and household demographics (where feasible for multifamily buildings) to support equity analysis. Performance will be measured in terms of direct benefits that are described briefly below and in the Summary Table of Goals:

- Share of rebates spent on units in low-income buildings and on units located in disadvantaged communities
- Customer-reported satisfaction and home comfort, as self-reported in post-upgrade surveys
- Share of Home Energy Rebates-funded projects completed by contractors that participate in DCSEU's Train Green program

DOEE's application for the TREC program contains additional workforce development metrics, such as the number of workers from disadvantaged communities that participate in residential energy contractor training under Train Green.

Summary Table of Goals

Commitment	Metric	Year 1 Goal	Year 2 Goal	Year 3 Goal	Year 4 Goal	Year 5 Goal
Engage directly with residents of low-income and disadvantage communities	Number of education, outreach, and engagement sessions with residents living in participating buildings					
	Status of grant to engage residents in a sample of participating buildings	Award grant and begin pre-retrofit engagement	Continue pre- and post-retrofit engagement	Continue pre- and post-retrofit engagement and close out work		
	Status of grant to conduct education and outreach on energy efficiency and electrification, with a focus on low-income and disadvantaged communities	Award grant and begin education and outreach activities	Continue education and outreach activities	Continue education and outreach activities and close out work		
	Number of education and outreach events on energy efficiency and electrification	5	6	7	7	7
Engage directly with labor	Number of DOEE meetings with labor representatives and unions	2	3	3	3	3
Prioritize work in low-income and disadvantaged communities	Percent of rebate reimbursements spent on units in low-income buildings that participate in program	100%	100%	100%	100%	100%
	Percent of units served located in disadvantaged communities	40%	40%	40%	40%	40%
Prioritize electrification	Percent of units served that transition from gas-based to electric-based heating systems	25%	35%	40%	45%	50%
Ensure high customer satisfaction	Percent customer (building owner/manager and tenant) satisfaction with retrofit, including comfort of home	90%	90%	90%	90%	90%
Build Contractor workforce	Status of DCSEU Train Green and workforce development programs	Update and roll out contractor training program, including recruitment of workers from underserved communities	Ongoing refinement and implementation of training program	Ongoing refinement and implementation of training program	Ongoing refinement and implementation of training program	Ongoing refinement and implementation of training program
	Percent of projects completed by contractors that participate in Train Green	20%	30%	40%	50%	60%