

Attachment 2

Community Benefits Plan

State of Wisconsin Home Energy Rebates Home Efficiency Rebate (HOMES) Program

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Purpose and Introduction

The Inflation Reduction Act (IRA) Home Efficiency Rebate Program in Wisconsin, heretofore referred to as the HOMES program, aims to encourage the adoption of energy saving measures in the state's existing housing stock to reduce residents' energy consumption, address challenges of energy affordability, and to promote sustainable practices.

The purpose of this document is to summarize the specific objectives the State of Wisconsin is committing to in its Community Benefits Plan (CBP). This will include defining the intended community benefits in quantifiable terms with SMART milestones – **S**pecific, **M**easurable, **A**chievable, **R**elevant, and **T**imely – and timelines wherever possible.

This CBP for the HOMES program, led by the State of Wisconsin and delivered by Focus on Energy, outlines the strategy and objectives for community and workforce engagement as well as diversity, equity, inclusion, and accessibility in alignment with the Justice40 Initiative. This CBP is also intended to document the benefits this program will provide to Wisconsin residents and workers that may have historically faced disproportionate barriers to accessing energy efficiency programs available in the state. The program is a next step in improving energy upgrades in homes across the state, with a focus on low-to-moderate income residents statewide, and residents living in Justice40 Disadvantaged Communities (DACs).

SMART Goals

Department of Energy (DOE) program guidance requires states to include at least one SMART milestone per calendar year to measure progress on proposed actions. The State of Wisconsin proposes the SMART milestones in the table below. The State of Wisconsin commits to making this Community Benefits Plan, the SMART milestones it establishes, and measured progress toward those milestones available to the public on the Focus on Energy website. Additional discussion of these SMART milestones is presented in subsequent sections of the CBP.

Year	Community and Labor Engagement	Investing in Job Quality and a Skilled Workforce	Diversity, Equity, Inclusion, and Accessibility	Justice40
2024	<ol style="list-style-type: none"> 1. Exploring one or more agreements (e.g. MOU) between PSC and DEHCR to align HOMES program and WAP. 2. Leverage existing Focus on Energy Trade Ally contractor network to recruit workforce of IRA Home Energy Rebates Registered Contractors. 	<ol style="list-style-type: none"> 1. Inventory areas of the state that currently do not have Focus on Energy contractors available to serve adjacent DACs. 2. Participate in 50123 TREC Workforce Advisory group meetings. 	<ol style="list-style-type: none"> 1. Inventory areas of the state currently underserved by efficiency programs. Use this data to find overlapping communities in Justice40 DACs to target outreach and engagement to. 2. Partner with at least 10 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and refer eligible households to participate. 	<ol style="list-style-type: none"> 1. Set program goal at least 40% of rebate spend occurs in Justice40 DACs. 2. Partner with at least 10 community-based nonprofits located in Justice40 communities across the state to spread awareness of the program and refer eligible households to participate.
2025	<ol style="list-style-type: none"> 1. Build or expand upon existing labor relationships with the labor organizations described in this 	<ol style="list-style-type: none"> 1. Leverage communication channels to reach past participants of HOMES program to notify them of 	<ol style="list-style-type: none"> 1. Partner with at least 5 community-based nonprofits located in Justice40 communities across the state to spread 	<ol style="list-style-type: none"> 1. Hold a Tribal Energy Symposium event on IRA Home Energy Rebate programs.

	<p>report. Establish annual meeting cadence.</p>	<p>potential job and training opportunities.</p> <p>2. Meet with Wisconsin Department of Workforce Development (DWD) on workforce needs resulting from IRA Home Energy Rebates.</p>	<p>awareness of the program and refer eligible households to participate.</p> <p>2. The State of Wisconsin commits to providing customers with information and tools to support a diverse choice of contractors from a variety of DEIA backgrounds, specified in more detail in this CBP.</p>	<p>2. Continue to engage with CBOs of 2024 efforts, at least biannually. Partner with an additional 5 CBOs located in DACs to expand partnerships and reach.</p>
2026	<p>1. Build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.</p>	<p>1. Identify DACs in the state that have had low participation in the IRA Home Energy Rebates due to contractor availability.</p> <p>2. Coordinate with the 50123 TREC effort to provide training in these areas of the state.</p>	<p>Recruit at least 10 new IRA Home Energy Rebates Registered Contractors with DEIA designations, defined later in this plan, by the end of the second year of the HOMES program.</p>	<p>1. Identify DACs in the state that have had low participation in the IRA Home Energy Rebates and partner with at least 5 CBOs located in this low-participation DACs to boost participation.</p> <p>2. Track status of low-income program participation to date in single-family and multifamily households as well as percentage of program spending on projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward 60% spend goal on low-income households and 40% of project funds awarded toward</p>

				projects located in Justice40 DACs.
2027	1. Build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.	1. Commits to partnering with at least 2 technical colleges in the state to encourage them to include rebate-eligible technologies into their curriculum during the implementation period of the HOMES program, to foster a future clean energy workforce pipeline.	1. Recruit at least 5 new IRA Home Energy Rebates Registered Contractors with DEIA designations.	1. Continue to engage with CBOs of 2024-2026 efforts, at least bi-annually. Partner with an additional 3 CBOs located in DACs to expand partnerships and reach. 2. Track status of low-income program participation to date in single-family and multifamily households as well as percentage of program spending on projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward 60% spend goal on low-income households and 40% of project funds awarded toward projects located in Justice40 DACs.
2028	1. Build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.	1. As program funds are nearing depletion, meet with Wisconsin Department of Workforce Development (DWD) on workforce needs resulting from	1. Recruit at least 3 new IRA Home Energy Rebates Registered Contractors with DEIA designations.	1. Track status of low-income program participation to date in single-family and multifamily households as well as percentage of program

		IRA Home Energy Rebates, including how industry has changed and anticipated shifts as funding runs out.		spending on projects located in Justice40 DACs. Measure this status against goals set at program launch, specifically, progress toward 60% spend goal on low-income households and 40% of project funds awarded toward projects located in Justice40 DACs. Consider additional partnerships with CBOs based on results and rebate distribution throughout state.
2029	1. Build or expand upon existing labor relationships with the labor organizations described in this report. Establish annual meeting cadence.	1. As program funds are nearing depletion, meet with Wisconsin Department of Workforce Development (DWD) on workforce needs resulting from IRA Home Energy Rebates, including how industry has changed and anticipated shifts as funding runs out.	1. Recruit at least 3 new IRA Home Energy Rebates Registered Contractors with DEIA designations.	1. Identify at least 3 CBOs located in DACs to develop scope for a clean energy workforce career pipeline program with.

Given that this is a new, federal program to be launched in Wisconsin, some goals are difficult to be defined as specific and achievable until after one year of implementation. In the table above, the State

of Wisconsin has put forth our best attempt to capture how the state will encourage and ensure that the HOMES program benefits communities – especially those that are low-income and in Justice40 disadvantaged communities. As part of achieving these goals, as well as the minimum requirements put forth by the Department of Energy, Wisconsin commits to tracking and reporting of metrics such as:

- Number of projects completed in Justice40 DACs.
- Number of projects completed in energy-burdened census tracts.
- Rebate spend on projects completed in Justice40 DACs.
- Rebate spend on projects completed in rural census tracts.
- Rebate spend on projects completed in energy-burdened census tracts.
- Estimated energy savings from projects completed in Justice40 DACs.
- Estimated energy savings from projects completed in energy-burdened census tracts.
- Customer satisfaction with program.
- Customer self-reported energy bill reduction impacts.

This tracking and reporting will be used to assess the program’s performance relative to the SMART goals outlined in the table above and may inform areas of program improvement to increase the likelihood that goals are achieved.

The remainder of this document will summarize the specific objectives the State of Wisconsin is committed to in the relevant section of this Community Benefits Plan, broken into specific commitments, engagements, tasks, and sub-tasks.

General Program Information

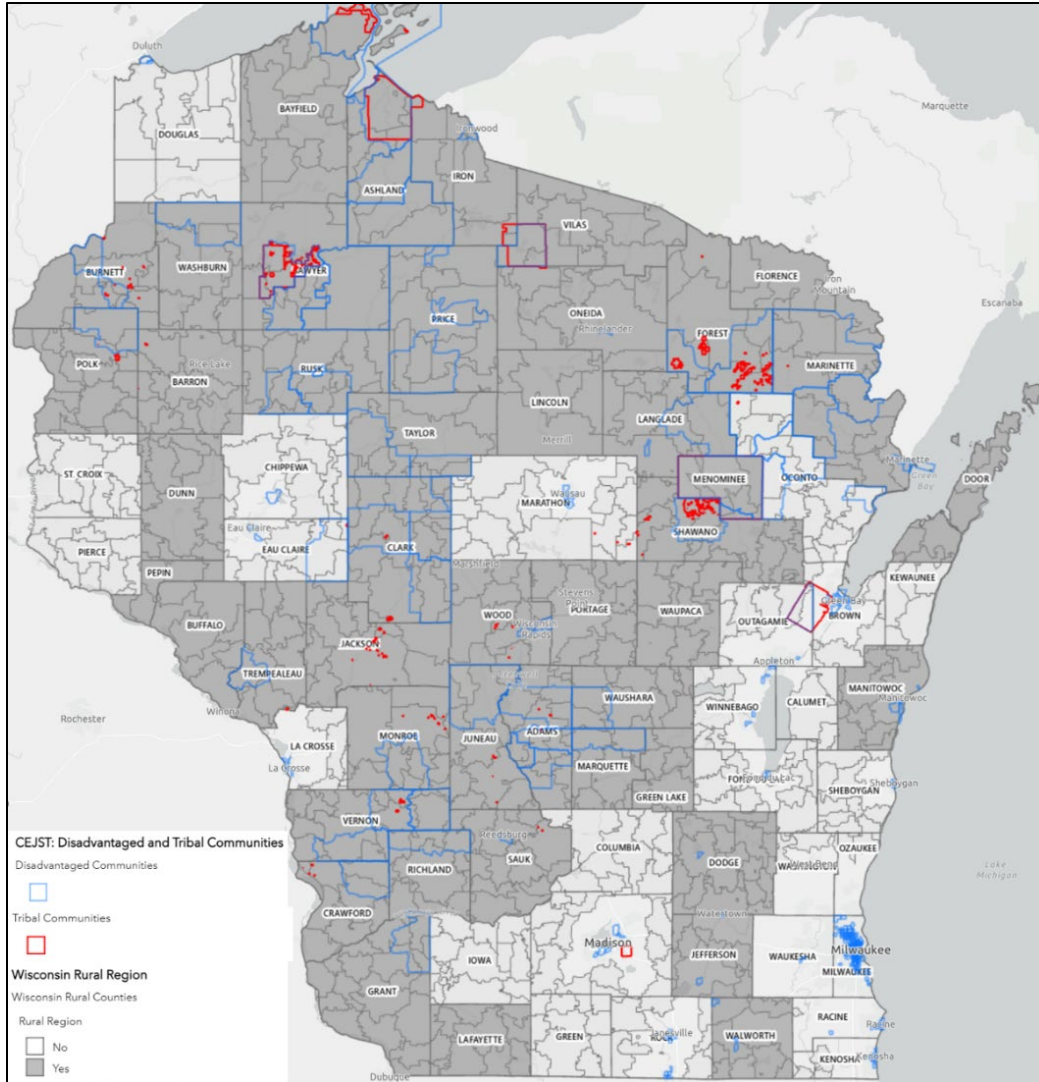
The HOMES program will provide rebates to Wisconsin residents performing qualified whole-home retrofit and improvement projects demonstrating the capability of delivering minimum levels of energy savings verified by tools/software meeting the State’s approved criteria. Participants will benefit financially through bill savings, as well as non-energy benefits such as potentially improved comfort, safety, and positive health outcomes as a result of improving their home. Projects will also contribute towards a reduction in greenhouse gas emissions. In alignment with the requirements of the Inflation Reduction Act and U.S. Department of Energy, Wisconsin will make this program available to residents of single family and multifamily buildings in the state living in all households regardless of income. The State of Wisconsin is seeking authorization to offer higher rebate levels to eligible low-income households to encourage adoption of energy saving measures for those residents of the state who have traditionally been underserved by whole-home energy projects due to high upfront costs. Additionally, the State of Wisconsin will offer incentives to Registered Contractors performing projects in Justice40 DACs to encourage greater access to program rebates to residents of these communities.

The State of Wisconsin’s Public Service Commission (PSC) has established additional guiding principles to ensure the benefits of Wisconsin’s HOMES program are distributed to underserved and disadvantaged communities in the State. The PSC has outlined the following strategic objectives and core principles for the design and delivery of these funds to advance equity and improve the lives of energy burdened households:

1. The program should leverage existing Focus on Energy infrastructure to maximize administrative efficiency and improve customer experience while maintaining appropriate separation, per Commission order.
2. The program will target rebates to customers where up-front costs have been barriers to participating in Focus on Energy and particularly, in areas of the state with high energy burden and service territories that depend on delivered fuels.
3. The rebate experience should be simple and clear for all participants (customers, contractors, distributors and retailers). Customer eligibility requirements, product and project requirements, and other processes should be well documented and easily understood.
4. Electrification projects should result in reduced household energy bills.
5. Program planning and implementation will be transparent and offer opportunities for stakeholder input and public comment.
6. Program design should support long-term workforce development opportunities and leverage contractor training grant funding where possible.

With these guiding principles in mind, as well as other federal funding opportunities occurring in Wisconsin, the PSC has created a webmap to display Justice40 DACs alongside rural zip codes and tribal communities, which are target underserved communities in the state. This webmap can be accessed from the PSC website.¹ A screenshot of the webmap is shown below.

¹ Public Service Commission Office of Energy Innovation. OEI Map. Accessed from:
<https://maps.psc.wi.gov/portal/apps/webappviewer/index.html?id=cd2b3dc76d4d460da05d72c254123318>



The next sections of this CBP will focus on how the State of Wisconsin will ensure the HOMES program rebate funds benefit Wisconsinites – particularly those of in disadvantaged, rural, and underserved communities, as well as supporting details on how Wisconsin will meet our SMART goals and timelines.

Engage Community and Labor

Wisconsin performed a robust effort to engage with residents, community partners, local and Tribal governments, and the state’s workforce and labor organizations to educate stakeholders on the programs and gather their input on key program design considerations. The program is committed to engaging with underserved communities, including DACs, in the program planning, design, implementation, and evaluation processes.

The Wisconsin HOMES program will be delivered through Focus on Energy (Focus), Wisconsin’s statewide energy efficiency and renewable resource program funded by utility customers. Delivery of HOMES program will build upon the community and workforce relationships cultivated by Focus over

more than two decades of delivering efficiency programming to Wisconsin residents and communities. The State of Wisconsin also recognizes that the Focus program has not been able to serve all residents of the state equally in those two decades— whether due to utility participation, heating fuel source, customers' ability to pay for the upfront costs of energy efficiency, awareness of the program, or other factors. For these reasons, the State of Wisconsin views the HOMES program as an opportunity to serve those that have historically been unable to participate in existing efficiency programs as well as those that could benefit most from energy savings (i.e., those with high energy burdens).

The State of Wisconsin and Focus have been engaging communities, including local governments, Tribal governments, and community-based organizations located in and serving DACs, in several ways over the last couple years to improve access and uptake of energy efficiency programs. The details of these efforts are described below.

Background: Community and Labor Stakeholders Engaged to Date

Community-Based Organizations

Over the last year, Focus has increased its outreach efforts with community-based organizations (CBOs) that work with marginalized communities to gather input on effective methods to reduce barriers to existing state program participation for the populations they serve. The learnings of this ongoing effort can be applied to implementing the HOMES program rebates to ensure communities with the most need will have access to and experience the program's benefits. Focus recently interviewed staff and volunteers at 20 CBOs throughout Wisconsin to learn how energy intersects with their work, build relationships, gauge interest in future collaboration with Focus, and learn how they target their services to overcome barriers to helping those most in need.

The CBO partners selected for interviews serve communities:

- on low- or fixed-incomes;
- with significant populations of people of color, non-English or limited-English speaking populations;
- that are rural; or
- that are predominantly older adults (aged 65+), veterans, renters, or people living with disabilities.

The approach to selecting CBOs for interviews also considered their geographic service territory and the extent that territory overlaps with Justice40 DACs (based on the Department of Energy's CJEST screening tool). Many of these organizations specialize in emergency food provisions (food pantries), housing services, and other emergency and social services.

This engagement was performed during spring and summer of 2023. Through this effort, Focus staff gained familiarity with the programs available to assist homeowners and renters in improving energy efficiency in Wisconsin. Focus staff also came away from these interviews with specific information on barriers to participation, areas of interest for these customers, and connections for further outreach and engagement, including potential collaboration on new federal energy rebate programs (i.e., Home Energy Rebates).

Some of the main themes learned from interviews conducted by Focus, which the State of Wisconsin will consider during the design and implementation of the HOMES program, include:

- CBOs need a clear understanding of energy efficiency programs available (e.g. eligibility requirements, equipment or services covered, etc.).
- Underserved communities are less likely to be aware that energy-saving programs, like Focus, exist or how to take advantage of them.
- Renters have limited opportunities to participate in efficiency programs, despite often having higher energy burdens and societal disadvantages. Program administrators should consider how to engage landlords on programming that benefits tenants, as well as how to communicate what programs are available for tenants to participate in directly.
- Older adults are a uniquely underserved demographic that live on a fixed income, are less likely to receive information when promoted digitally or when online participation is required and are wary of scams.
- First costs of energy efficiency projects remain a barrier to participation, even when higher incentives are eligible to lower income participants.
- Cultural and linguistic barriers reduce accessibility to efficiency programs. Offering program materials and websites in additional languages and partnering with CBOs can address this barrier.

In response to these barriers, the State of Wisconsin and Focus staff will continue to engage with these organizations and additional organizations serving as trusted community resources as they are identified, throughout the planning and implementation phases of the HOMES program. The State of Wisconsin recognizes the time and expertise provided by these organizations as well as their ability to reach residents that can benefit the most from efficiency and home energy upgrades. Additional planning and discussion on what framework to use for potential CBO compensation is anticipated, which would include the overall budget, individual or group rates, and qualifying actions.

A list of some, but not all, of the community-based organizations that Focus has engaged with to date are listed below.

Community-Based Organizations Engaged to Date

- Wisconsin EcoLatinos
- Walnut Way / Lindsay Heights Neighborhood Improvement District
- Sheboygan County Housing Coalition
- Green Homeowners United
- Citizens Action Wisconsin (energy burden coordinator)
- Elevate Energy
- Wisconsin Citizens Utility Board
- Aging & Disability Resource Center (ADRC) of Dane & Brown Counties
- Urban League of Greater Madison
- Food pantries: WayForward (formerly Middleton Outreach Ministries), Stepping Stones, CORE Community Resources, and Project Bootstrap

Local Governments Engaged to Date

Over the last year, Focus has built new relationships and strengthened existing relationships with local governments across Wisconsin. Focus recently hired a Community Liaison Manager to fulfill this role. Since then, staff have met with over 50 local governments across Wisconsin to learn how the program

can better support local energy goals and partner to ensure their residents and businesses are aware of energy efficiency resources and incentives available to help them save energy/money. Local governments have been engaged to date to understand their priorities for delivering the HOMES program benefits to their residents, as well as to identify locations and stakeholders to engage during the HOMES program planning process. The Focus Community Liaison Manager will serve on the HOMES program team supporting coordination and engagement with local governments.

Focus has also built relationships with the Wisconsin Local Government Climate Coalition and Wisconsin Department of Natural Resources (DNR) Green Tier Legacy Communities program. These groups support communities that are actively involved in promoting the Focus program or creating their own energy efficiency programming for their localities. The communities engaged thus far have expressed interest in learning more about Inflation Reduction Act funds and are anticipated to be active partners in connecting residents to participate in and benefit from the HOMES program.

Through its outreach and engagement efforts over time, Focus has established relationships with the following partners representing local governments:

- **Wisconsin Local Government Climate Coalition (WLGCC)** WLGCC is a collective of cities and counties in Wisconsin that together, represent 1 in 3 Wisconsin residents. The goal of the coalition is to advocate for strong climate action in the state. The group has been supportive of Focus and energy efficiency generally and is eager to help support engagement and participation in new federal funding opportunities, including the U.S. Home Energy Rebate programs in Wisconsin.
- **WI Department of Natural Resources Green Tier Legacy Communities (GLTC)** Hosted by the Wisconsin DNR, the GLTC are a group of local government leaders preparing for the future and building sustainable and resilient communities. The GLTC network advances sustainable, efficient practices to stretch local government resources. It includes mostly different cities from the WLGCC, including areas of the state that have high rates of delivered fuels.
- **Vernon County Energy District (VCED)** The VCED is a nonprofit located in Vernon County, WI with a goal of fostering local, sustainable energy to meet the needs of the county. They promote energy efficiency and renewable energy resources, and have expressed an interest in these federal funds due to the high energy burdens and proportion of delivered fuels in their area.

Tribal Governments

The Focus program is available to all 12 Tribal governments in Wisconsin that are served by participating utilities. Wisconsin will leverage the Focus program's existing and growing relationships with Tribal governments to ensure that Tribal communities have access to participate in the HOMES program. For example, to increase participation in energy efficiency programs amongst tribal members and in homes on tribal land, Focus partners with Tribal governments to offer a special program to train tribal community members on Building Performance Institute certification to enable more homes on tribal land to qualify for higher insulation and air sealing rebates. This program not only builds energy efficiency workforce skills, but also improves the payback of insulation and air sealing through higher rebates. Focus is also partnering with two local energy efficiency nonprofits, Slipstream and Elevate, to

improve the efficiency of multifamily homes on tribal land, including the weatherization and installation of air source heat pumps to reduce propane usage and provide efficient air conditioning to these spaces.

The PSC and Focus on Energy staff held the first Tribal Energy Symposium in spring of 2023. Six Tribal Nations attended along with representatives from utilities, DNR and Slipstream. The Symposium was convened to promote energy efficiency programs available for Tribes, identify Tribal government needs and goals that relate to energy, and identify the most efficient way to participate in existing Focus programs. The Symposium was positively received by participants. A second Tribal Nation Energy Symposium was hosted by the Forest County Potawatomi Community (FCPC) in autumn of 2023 to build upon on the work of the spring 2023 event. The second symposium focused on information sharing about grant opportunities, energy planning, and heat pump technology. It also included a tour of the FCPC buildings with renewable energy facilities.

Given the success of these events, the State of Wisconsin commits to hosting a Tribal Energy Symposium in 2025 on the topic of IRA Home Energy Rebates in Wisconsin and how to increase access and participation in the HOMES program.

Ongoing Engagement with Wisconsin's Energy Workforce

Focus on Energy has fostered relationships with its Trade Ally contractor network over time. These valuable contractors and service providers are qualified to partner with Focus to deliver energy efficiency and renewable products (mostly solar) and expertise directly to Wisconsin residents. Focus on Energy promotes the diversity of its contractor network by allowing each Trade Ally to self-identify as a Minority Business Enterprise (MBE), a Women-Owned Business Enterprise (WBE), or a Disabled Veteran Business (DVB). Additionally, the program asks contractors whether they are able to provide Spanish as a spoken language for customers. Interested program participants can search for qualified contractors identifying themselves by these aforementioned statuses using the Focus on Energy "Find a Trade Ally Tool" on the program website.

Additionally, Focus provides Trade Ally contractors with informational materials on current rebates available to customers through Focus, access to building science and new technology training opportunities, and updates on market trends and cutting-edge technologies entering the state market. The State of Wisconsin plans to use the same delivery framework to share information about the IRA HOMES program to Trade Ally contractors.

Focus maintains regular contact with its Trade Ally contractor network through emails and newsletters as well as annual Trade Ally breakfasts held throughout the state. Through these channels Focus shares incentive updates and news about changes to the industry, such as the HOMES rebate program.

While some Trade Ally contractors are union members, it is not a requirement of the program. However, in the past few years two notable engagements with union contractors have emerged. Green Homeowners United, a union contractor and Trade Ally, are also vocal advocates for the program and provide Focus with feedback on field trends, emerging technology, and solutions to traditional barriers to program participation. In late spring of 2023, Green Homeowners United invited Focus staff to attend an event at the Laborers' International Union of North America (LIUNA) training facility, regarding preparing a green workforce for the IRA rebates. Several organizations agreed to ongoing partnership to share information and collaborate, including Focus on Energy, Revitalize Milwaukee, Wisconsin Department of Health & Safety's Lead Safe Homes Program, Dane County Office of Energy & Climate

Change, Laborers' Union, and others. The State of Wisconsin plans to continue engaging with these groups and communicate opportunities that the HOMES rebates can present once available.

Coordination with Low-Income Weatherization Assistance Program: Wisconsin's Department of Administration's Division of Energy, Housing, and Community Resources (DEHCR)

In preparation for this program, the PSC and Focus staff conducted outreach and coordination with the Wisconsin Department of Administration's Department of Energy, Housing, and Community Resources (DEHCR). DEHCR administers Wisconsin's Home Energy Assistance Program (WHEAP), Weatherization Assistance Program (WAP) and Home Energy Plus (HE+) Program Services. The outreach and coordination efforts were undertaken to explore opportunities to integrate HOMES program opportunities to benefit low-income residents of the state who may also be participating in other federal low-income energy assistance programs. PSC and Focus staff have established recurring coordination meetings with DEHCR staff. The State of Wisconsin commits to continued engagement and partnership with DEHCR throughout the planning, design, and implementation of the HOMES program. Specific commitments for this coordination include:

- Coordination meetings (at least quarterly) to discuss program performance and identify opportunities for enhanced collaboration and process improvements.
- Exploring the opportunities for one or more agreements (e.g., Memorandum of Understanding) between the PSC and DEHCR to support efficient program integration between the HOMES program and WAP with regard to utility data, categorical eligibility and targeting specific homes who may be a good candidate for the Home Energy Rebate programs.

For future engagement, the State of Wisconsin will focus on partnerships with trusted community nonprofits, Community Action Agencies (CAAs) (funded by DEHCR), rural electric municipal and cooperative utilities, and landlord associations that overlap with DAC territories and rural areas of the state to ensure that marketing and outreach of the HOMES program is targeted to DACs and customers heating and cooking with delivered fuels. CAAs implement the Weatherization Assistance Program in the state and can offer referrals to households that are good candidates for HOMES (outside of any federally-funded work already planned to be done in a home), particularly for multifamily housing. The State of Wisconsin will work with these CAAs to encourage referrals to households located in DACs to deliver the energy efficiency and electrification benefits that the HOMES program can offer to these communities.

The State of Wisconsin has established a strategic objective to target HOMES programming toward households throughout the state that rely on delivered fuels as their primary heating source. These households tend to be located in rural areas and may also overlap with DACs. The following factors have contributed toward the State of Wisconsin establishing this strategic objective:

- Customers that rely on delivered fuel as their primary heating source are more likely to spend a greater portion of their income to heat their home than customers with natural gas service. As a result, these households are less likely to experience increased energy costs when electrifying their space and water heating equipment.
- Customers that rely on delivered fuel as their primary heating source are likely to experience greater volatility in the cost to heat their homes compared to customers relying on other fuels.

- Customers that rely on delivered fuel as their primary heating source are not eligible for Focus rebates when fuel switching from delivered fuels to electricity. HOMES rebates may help to address a market gap.
- Customers served by municipal utilities and electric cooperatives have lower electric rates, on average, compared to customers of investor-owned utilities.

Future Community and Labor Stakeholder Engagement

The section below outlines some of the community partners that have already been identified – whether by previous engagement with Focus, the PSC, or through referrals from partners – that will be key to distributing IRA HOMES program rebates equitably in Wisconsin. The list is not intended to be comprehensive. The State of Wisconsin recognizes that as staff engage these partners, utilities, local governments, and other stakeholders and that as awareness of the HOMES program grows, more organizations and stakeholders will become important partners. As a separate but related effort, Focus is in the process of analyzing and understanding which customers have historically been underserved by the program. As a result of this research, it is anticipated that Focus staff will seek new partnerships to boost participation in both Focus and HOMES programming in these geographic areas of underserved communities.

In addition to this targeted outreach, the State of Wisconsin held multiple public input sessions as part of planning for the IRA Home Energy Rebate programs. The dates of these sessions are presented in the table below. In-person and virtual attendance options were provided, with Spanish translation provided at some locations for accessibility, to provide educational information about the benefits of these programs to interested stakeholders. Locations for public input sessions were determined based on local government feedback that these should be held across the state, located in or near Justice40 disadvantaged communities, and accessible by multiple forms of transportation. Local governments also provided a list of CBOs to invite to participate and recruit community members to attend. An online survey was also developed to gather public feedback on key program design elements. The feedback collected from local governments, contractors, community-based organizations, and residents were used to inform the final design of the HOMES rebate program are included in this CBP to ensure that the funds will benefit the communities that are served. Many of the stakeholders mentioned in this CBP were invited to attend these events or at a minimum, provide their feedback via online survey. Through Wisconsin’s public engagement process, staff engaged over 590 individuals and entities (not including contractors) to provide feedback on program design. A breakdown of participation can be found in the table below.

Table 1: Participation by Event and Outreach Platform

In-Person Session Summary			
City	Date/Time	Location	Attendees
Green Bay	Tuesday, January 23, 2024 1:30-3:30 pm	Brown County Central Library	34
Milwaukee (North)	Thursday, January 25, 2024 6-8 pm	Washington Senior Center	13
Milwaukee (South)	Thursday, January 25, 2024 6-8 pm	Urban Stables	12
Madison	Tuesday, January 30, 2024 6-8 pm	Village on Park	27

Viroqua	Monday, February 12, 2024 6-8 pm	Vernon County Museum	31
Ashland	Tuesday, February 20, 2024 6-8 pm	Blue Wave Inn & The Sandbar	40
		<i>In-person Session Total</i>	<i>157</i>
Virtual Session Summary			
Virtual #1	Thursday, February 8, 2024 6-7:30 pm		81
Virtual #2	Monday, February 26, 2024 6-7:30 pm		101
		Virtual Session Total	182
Online Survey Summary			
Available January 2, 2024 – February 29, 2024			253
		All Total	592

For residential in-person and virtual engagement sessions, attendees were provided a presentation overview of the IRA Home Energy Rebates before input was collected through facilitated small group discussions. During these discussions, the following questions, which were similar to the online survey prompts, were asked:²

1. What best describes you? (Resident, trade ally, and/or community or promotional partner)
2. What equipment would you be interested in installing in your home?
3. Who do you trust most to learn about improving your home or reducing your energy use?
4. When making home energy upgrades, which three factors are most important to you?
5. How familiar are you with income qualification and the area median income?
6. What approach would you recommend for Wisconsin:
 - a. Offer moderate rebates to enable more households to participate
 - b. Increase rebate amounts for low-income and/or energy burdened households
 - c. Offer DOE-defined maximum rebates for all equipment
 - d. No preference
7. Which approach would you prefer Wisconsin use in structuring its IRA Home Energy Rebate programs?
 - a. Make IRA rebates available to as many Wisconsin households as possible
 - b. Prioritize serving households with incomes below a certain level
 - c. Prioritize households that currently cannot take advantage of Focus on Energy
 - d. No preference
8. Do you have suggestions on how Wisconsin's IRA Home Energy Rebates can best reach DACs, high energy burdened customers, and/or low-income communities?
9. How restrictive should Wisconsin be on retroactivity?
10. Do you plan to participate?

For Trade Ally contractor feedback, more than 450 contractors registered to attend input sessions across the state. The dates and locations of these engagements can be found in the table below:

² The questions listed here are not exhaustive nor worded verbatim, but rather are summarized here for brevity. For an unabridged version of questions, asked in the precise wording in which they were posed, please refer to the Stakeholder Outreach Summary.

Focus on Energy Sponsored Breakfasts – 459 Registered Attendees	
City	Date
Green Bay	Tuesday, January 23, 2024
Wausau	Wednesday, January 24, 2024
Milwaukee	Thursday, January 25, 2024
Pewaukee	Friday, January 26, 2024
Madison	Tuesday, January 30, 2024
Xcel Energy Sponsored Breakfasts	
Onalaska	Tuesday, February 13, 2024
Eau Claire	Thursday, February 15, 2024
Ashland	Wednesday, February 21, 2024

Trade ally contractors were asked:

1. Will your company participate in the IRA Home Energy Rebate programs?
2. Would your company be interested in working in DACs, if there were funding to support bonuses for projects completed there?
3. Does your company currently assist with income verification?
4. Do you agree with requiring envelope improvements be completed before HVAC upgrades?
5. Do you have any other thoughts to share regarding retroactivity?

Below is a summary of themes heard from stakeholder groups. A detailed review of feedback provided from stakeholder feedback sessions can be found in the Stakeholder Outreach Engagement Summary which has been included as a separate document in this application.

Themes from Public Engagement Events (including in-person, virtual, and online survey responses):

- Insulation and air sealing projects were of highest interest to potential program participants, followed by heat pumps for space heating and cooling and heat pump water heaters.
- Focus on Energy is the most trusted information source for residents to learn about home energy projects or reducing their energy use.
- Saving money is the most important factor for why residents in Wisconsin make home energy upgrades, followed by reducing energy use.
- Overall, residents are only somewhat familiar with area-median income to determine whether their household is eligible.
- Overall, responses were nearly equally split amongst those engaged that said they preferred the State of Wisconsin to offer low-to-moderate rebate amounts to serve as many households as possible versus prioritize households with lower incomes and high energy burden.
- Participants stressed the importance of partnering with community-based organizations to spread awareness of the program when available.
- Participants stressed the opportunity of partnering with the state Weatherization Assistance Program providers to deliver these funds to those that could benefit the most.
- Participants stressed the need to engage landlords to ensure that renters are not left out from benefiting from the IRA HOME Energy Rebate programs.
- Many Wisconsinites expressed interest in participating in the program immediately or within 3 years of the program being available. Customer excitement for these IRA HOMES programs is very high.

- Rural customers expressed serious concern of contractor availability – especially for energy assessors – in their area and the lack of contractors could exclude their ability to access these funds.
- Cost of energy assessments were raised as a potential barrier to participation.

Themes from Trade Ally Engagement Events (including in-person and online survey responses):

- Most Trade Allies responded that they would likely participate in IRA HOMES Programs. Trade Allies stated that the reason for their affirmative answer was the opportunity to reach underserved and low-income communities with instant rebates. Trade Allies noted that this is also an opportunity to expand their customer base due to demand in the marketplace.
- Trade Allies who stated they were not likely to participate cited federal program “red tape” and the perception that there will be too many roadblocks to deliver the rebates to customers. Income qualification liability, federal audits at the contractor level, income approval wait times, and cashflow concerns were also common themes heard at multiple sessions.
- Material and labor scarcity in Northern Wisconsin may be a participation barrier.
- All Trade Allies seemed to agree that retroactivity, in some form, is necessary given high market awareness of energy efficiency programs set to launch because of the Inflation Reduction Act.
- Trade Allies were not in agreement whether envelope improvements should be required to be completed before HVAC upgrades. Trade Allies who did not agree stated they disagreed in instances where health and safety would not allow envelope work to be completed first or when envelope work is not deemed necessary due to adequate condition of existing materials.
- Trade Allies stressed the importance of determining program requirements in all areas as soon as possible to allow them to prepare adequately for program launch. Insulation Installers and Home Energy Assessors both voiced the need to have a complete set of rules surrounding the energy assessments required for this program as soon as possible to allow businesses to learn the software tools. It was suggested that once program design and requirements have been finalized, a training course would be helpful for Trade Ally contractors.
- Trade Allies who work in rural Wisconsin expressed interest in being able to provide rebates to customers on delivered fuels. They suggested that working with electric utilities and delivered fuel providers would be the best way to reach this historically underserved population.

The State of Wisconsin intends to maintain open and transparent engagement with its community and labor stakeholders throughout the planning, implementation, and evaluation phases of the HOMES program. The State of Wisconsin anticipates a future stakeholder engagement approach (e.g., type and frequency of the engagement) that is customized to the needs of the stakeholder group. Community and labor organizations that have been identified as key stakeholders to engage with to ensure that the benefits of the HOMES program go to the communities that need them most are discussed in the sections below. Additional stakeholder organizations may be identified and included in the state’s outreach and engagement strategy during future program phases.

Community Stakeholders to be Engaged:

Outreach and engagement to community and labor stakeholders will vary, but the majority of outreach to community stakeholders will likely be one-on-one meetings and discussions to build trust and value the unique perspectives and networks that each group can provide to ensure their community benefits from the HOMES program. Some, but not all community stakeholders that Wisconsin will engage are

mentioned below. Added context is provided for some organizations that have not been mentioned before or whose mission or role may not be self-explanatory.

- Wisconsin Local Government Climate Coalition
- Focus on Energy Partnered Community-Based Organizations
- Vernon County Energy District
- DNR Green Tier Legacy Communities
- Reclaiming Our Neighborhoods (RON) Coalition (Milwaukee)
- Sheboygan Housing Coalition
- UMOS (Milwaukee), Centro Hispano (Milwaukee & Dane Counties), Wi EcoLatinos (Dane, Rock, & Columbia Counties), Dane County Latino Academy of Workforce Development
 - These groups will provide insight on program design and marketing materials intended for Spanish speaking audiences, and can potentially provide referrals for Spanish speaking contractors to become Trade Allies.
- Hmong American Partnership (Appleton) and Hmong American Center (Wausau)
 - These groups can provide insight on program design and marketing materials intended for Hmong speaking audiences and can potentially provide referrals for Hmong speaking contractors to become Trade Allies.
- 16th Street Community Health Center (Milwaukee)
 - This group is a strong partner of the City of Milwaukee's Environmental Collaboration Office on environmental programming, but are also a strong CBO in their area of Milwaukee. Intended outcomes of engagement would be that this organization would understand the new and existing efficiency programs to connect and support residents in their community to participate.
- Habitat for Humanity (chapters across the state) & Revitalize Milwaukee
 - Both of these organizations complete home improvement and repair projects for residents with low-to-moderate incomes. In various forms, these groups are already installing or doing work adjacent to health and efficiency in the homes they work in. An intended outcome of engagement will be to make sure that these organizations are aware, and when appropriate implement projects using federal and state funds, to improve the lives of those living in the housing that they support.
- Community Action Program (CAP) agencies that implement Weatherization Assistance Programs, specifically those in high energy burdened counties with high propane or poverty levels. This outreach will be done in conjunction with DEHCR and is anticipated to include: CouleeCAP, Social Development Commission, Western Dairyland CAP, North Central CAP, West Central CAP, Central WI CAP, and Ashland County Housing Authority CAP.
 - Beyond just the coordination with the WI Department of Administration / Division of Energy, Housing and Community Resources on Weatherization Assistance Program, the intended outcome of this engagement would be a concerted effort to ensure partnerships and projects are completed with weatherization implementers in areas of the state that face the highest energy burdens.
- Walnut Way / Lindsay Heights Neighborhood Improvement District, Sherman Park ECO Neighborhood, Northwest Side Community Development Corporation, and Citizens Action WI

- These are neighborhood groups or community leaders (outside of RON Coalition) that serve Milwaukee residents that are energy burdened and in disadvantaged communities. Intended outcomes of engagement with this group would be that they can connect and refer residents in disadvantaged communities with energy burdens to participate in the HOMES program, as well as participate in workforce pipeline to diversify workforce as opportunities arise.
- Blacks for Political and Social Action
 - To partner with an organization that serves the BIPOC community of the Madison-metro area that could share awareness of these programs and the benefits of participation in their community.
- Wisconsin Apartment Association, as well as [regional apartment associations](#)
- Wisconsin Association of Housing Authorities
- Wisconsin Housing and Economic Development Authority (WHEDA)

Labor Groups to be Engaged:

Wisconsin will continue to engage the state’s clean energy workforce through Focus’ Focus on Energy Trade Ally contractor network. Focus will routinely communicate and seek contractor input on program design elements as well as recruit existing Trade Ally contractors to implement the HOMES rebates as Registered Contractors.

In addition, the State of Wisconsin will build or expand upon existing relationships with the following labor groups, likely through one-on-one conversations and meetings:

Plumbing, Heating, Cooling Contractors of Wisconsin

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

Wisconsin Chapter of National Electric Contractor Association

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

IBEW Locals 127, 890, 965, 388, 953, 577, 2150

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

LiUNA WI Laborers' District Council

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

BlueGreen Alliance, WI

Type of Engagement: Project Decision Making, Community Input, Reporting Back, Technical Assistance, Workforce readiness and development

Anticipated Frequency of Engagement: Annually

Intended Outcome of Engagement: Awareness of new federal funds and anticipated market shifts as a result. Alignment of activities to diversify workforce.

Investing in Job Quality and a Skilled Workforce

As described in the above section, Focus has fostered relationships with its Trade Ally contractor network over time. Focus promotes the diversity of its contractor network and provides Trade Ally Contractors with training opportunities and updates on market trends and cutting-edge technologies entering the state market. The State of Wisconsin's Office of Energy Innovation (OEI) has applied for an IRA Section 50123 Contractor Training Grant and has provided the U.S. DOE the application, program scope, and implementation plan for that funding. The State of Wisconsin plans to use those funds to invest in quality jobs and a skilled workforce capable of implementing the work needed to meet the goals of the HOMES program, and some details of that program are provided in this section.

Training for Residential Energy Contractors (TREC)

The OEI submitted a plan to DOE for the use of grant funds under the IRA Section 50123 funding opportunity and plans to use those funds to provide training grants to eligible entities, including organizations like technical colleges and other U.S. Department of Energy (DOE) approved certified training entities, to meet workforce training and certification needs across the state. This implementation plan was developed through discussions with key stakeholders including the Wisconsin Department of Workforce Development (DWD), the Wisconsin Technical College System (WTCS) and others. OEI staff met several times with key DWD staff to discuss the energy workforce needs of the state. DWD provided OEI with data projections and consulted on the approach to its TREC grant application. The identified needs have been factored into the planned program design, which would create and launch a grant program to provide funds to eligible entities that are DOE certified and experts in the workforce landscape of various Wisconsin communities. Through initial outreach, OEI has already identified 36 potential training locations, with outreach to other prospective applicants underway, that could apply for funds through this program to provide certification to new workers or upskill existing workers.

Through existing programs, OEI has a history of working with private entities, including contractors, in program implementation. As part of the TREC-funded program, OEI will design and convene a Workforce Advisory Group to help shape the direction of the program funded through TREC. This advisory group will be composed of subgrantees and contractors, and their contributions will help shape the design and direction of the program to meet changing workforce demands. As members of the Workforce Advisory Group and stakeholders engaged throughout the program's development, employers will have an opportunity to build relationships with the OEI and training partners. In helping

to connect trainees with job opportunities, employers will have the opportunity to provide feedback and critical data on job quality and pay that can help shape program design and training needs. Focus on Energy staff working on delivery of HOMES will participate as members of the TREC Advisory Group to ensure its efforts are well coordinated with workforce needs of the HOMES program. In addition, through its connection to OEI, Focus will share information with grant-funded training programs with its Trade Ally Network and CBOs that are interested in creating their own local workforce to encourage ongoing learning and development for workers on HOMES funded projects.

In 2026, the State of Wisconsin commits to identifying Justice40 DACs that have low participation rates in the IRA Home Energy Rebates due to contractor availability. Contractor availability can be quantified by a 100-mile radius from a IRA Home Energy Rebates Registered Contractor. The State of Wisconsin commits to coordinating with the 50123 TREC effort to train contractors in these areas to reduce barriers to participation in these areas. As part of the implementation of this HOMES program, the State of Wisconsin also commits to coordinating job training opportunities through TREC and communicating these opportunities to HOMES program participants that have self-selected (through post-participation satisfaction survey) to be kept apprised of job training opportunities in the clean energy workforce. These efforts will help the State of Wisconsin ensure the Wisconsin TREC program is doing outreach, engaging with, and training contractors in areas of the state that need certified and trained workers to implement the HOMES and HEAR programs.

Labor Relations

The historic levels of federal funding available through HOMES and HEAR programs will encourage new workers and create quality jobs in a range of careers. The State of Wisconsin and Focus pledge to remain neutral during any union organizing campaigns and allow union organizers access to outreach events and appropriate onsite non-workplaces. As part of the TREC funded program described in section Training for Residential Energy Contractors above, OEI plans to work with DWD to monitor job data in the Energy Auditor, HVAC Contractor, Plumbing, Electrical, and Home Performance Contractor sectors, gathering data on both job quality and quantity.

As discussed in the Engage Community and Labor section, the State of Wisconsin plans to engage further with Labor groups including LiUNA and IBEW Local branches on both the TREC program as well as to connect with jobseekers that have participated in the HOMES program. Likewise, as the clean energy workforce grows and changes in response to the HOMES program, the State of Wisconsin commits to sharing these trends with the Wisconsin Department of Workforce Development in order to ensure momentum in the industry continues to evolve during and after this program.

Diversity, Equity, Inclusion, and Accessibility

The State of Wisconsin is committed to incorporating diversity, equity, inclusion, and accessibility (DEIA) objectives into the HOMES program plan, design, and implementation. Below is a description of the State of Wisconsin's commitments to DEIA in these areas.

Commitment 1. The State of Wisconsin commits to partnering with Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and Veteran Owned Businesses for contractor support needs to deliver the HOMES program. Specifically, the State of Wisconsin commits to the following:

Commitment 1.1: Focus commits to developing a network of diverse contractors from a variety of backgrounds, including working to provide customers a choice of contractors who are: Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and/or Veteran Owned Businesses, and/or Spanish-speaking contractors to serve customers' needs.

Summary of scope of work: Focus has statewide network of Trade Ally contractors and currently allows these contractors to self-identify in the categories listed above. Customers can then filter contractors on the "Find A Trade Ally Tool" based on these DEIA categories that are located within their proximity. The State of Wisconsin commits to continuing – and expanding – this work for residents of Wisconsin to be able to search for IRA Home Energy Rebates Registered Contractors with these same DEIA designations.

Commitment 2.1: The State of Wisconsin commits to increase the number of IRA Home Energy Rebates Registered Contractors that either identify as a Minority Business Enterprises, Minority Owned Businesses, Woman Owned Businesses, and Veteran Owned Businesses, or Spanish-speaking services offered or that serve predominantly DAC(s) per year. These contractors would be searchable on the Find a Trade Ally Tool as eligible installers of HOMES program work. The State of Wisconsin has a goal of recruiting at least 10 such new IRA Home Energy Rebates Registered Contractors in the first year of the HOMES program, with a goal of recruiting 5 new contractors in subsequent years of the program.

Summary of scope of work: Focus will engage with community partners, such CBOs, local governments, utilities, and labor groups to identify and recruit eligible contractors and engage them in the standard training process necessary to be added to the program's list of qualified contractors. Connections to newly trained staff through other efforts such as the TREC program discussed in Training for Residential Energy Contractors may provide pathways to recruiting from new groups that will assist in meeting these goals.

Commitment 3.1: The State of Wisconsin commits to partnering with at least 2 technical colleges in the state to encourage them to include rebate-eligible technologies into their curriculum during the implementation period of the HOMES program, to foster a future clean energy workforce pipeline.

Summary of scope of work: OEI has begun and will continue to reach out to technical colleges, explain the HOMES program and eligible technologies and pathways to achieve rebates, as well as market impacts, and encourage technical colleges to start or bolster their clean technologies education curriculum. This will be done in conjunction with the TREC funded program discussed in Section Training for Residential Energy Contractors.

Commitment 2. The State of Wisconsin commits to implementing a plan to reduce barriers and improve access to jobs for local and underrepresented workers, including DAC residents, those with disabilities, returning citizens, opportunity youth, and veterans.

Commitment 2.1: The State of Wisconsin will work to develop a partnership with pre-apprenticeship or apprenticeship readiness programs to foster improved access for underrepresented workers to jobs.

Name of readiness programs:

- IBEW 195 apprenticeship program
- [Wisconsin Electrical Apprenticeship & Training Program](#)
- Wisconsin Plumbers Union Local 75 Apprenticeship Program

Scope of Work: Focus will engage with community partners, such CBOs, local governments, utilities, Wisconsin Department of Workforce Development, and union labor groups (listed previously) to identify and recruit eligible jobseekers and past participants of HOMES and connect them with union energy-related career paths. This strategy will begin with and will be based off early discussions with union labor groups, as its scope will be dependent on union halls' ability to absorb and recruit new workforce participants. That said, in workforce-related efforts regarding the IRA Home Energy Rebates, the State commits to including union career paths as options when connecting jobseekers to opportunities that arise from this funding.

Commitment 2.2: The State of Wisconsin will partner with training and placement programs [other than apprenticeship programs] for underrepresented workers.

Name of training and placement programs:

- Wisconsin Department of Workforce Development
- Building Science and Energy Management Program – Associate degree at Western Technical College
- Sustainable Energy Management Program – Associate degree at Southwestern Technical College

Scope of Work: Much like the scope of work described in Commitment E2.1, Focus will engage with community partners, such CBOs, local governments, utilities, Wisconsin Department of Workforce Development, and union labor groups (listed previously) to identify and recruit eligible jobseekers and past participants of HOMES and connect them with non-union energy-related career paths. This strategy will begin with and will be based off early discussions with technical colleges, as its scope will be dependent on union halls' ability to absorb and recruit new workforce participants. That said, in workforce-related efforts regarding the IRA Home Energy Rebates, the State commits to including non-union career paths as options when connecting jobseekers to opportunities that arise from this funding.

Justice40 Initiative

The Wisconsin HOMES program defines DACs as those communities corresponding to the US DOE's CEJST boundaries. The program design and delivery will quantify and track the project benefits that flow to residents of these areas. Many of these metrics were stated in the Purpose and Introduction section after the SMART goals for the program were outlined. The program will measure benefits flowing to these communities from projects completed at buildings located in these communities. Program spend will also be an important metric to measure and track to ensure that the HOMES program benefits DACs. The State of Wisconsin will track multiple forms of benefits to DACs through its rebate tracking and processing system and through program evaluation activities. The State of Wisconsin will use these processes to actively monitor program performance and ensure that applicable benefits flow to DACs.

Encouraging delivery of home efficiency rebates to disadvantaged communities: The Wisconsin HOMES program will increase the ability of low-income households to overcome the barrier of upfront costs of energy efficient technology by encouraging eligible participants to stack HOMES rebates with those offered Focus and other funding sources as appropriate. The State of Wisconsin has several strategies to encourage participation, and therefore the benefits of the HOMES program, to disadvantaged communities.

The State of Wisconsin intends to use rebate funds to compensate CBOs that commit to partnering with the program to support the participation of households, particularly those that earn low-incomes, that are located in DACs. The state recognizes the value of CBOs as trusted resources working on behalf of low-income households and households living in DACs. The state further understands that CBOs will be essential to building relationships in low-income neighborhoods and DACs and in supporting efficient and effective delivery of the HOMES program to those communities that stand to benefit the most. The relationships CBOs have built up within the communities they serve can help in overcoming barriers to participation (e.g., informational barriers, decision-making barriers, transactional barriers). This was expressed many times during stakeholder outreach planning sessions for the HOMES program. Proposed activities that CBOs may be compensated for include:

- Providing information to households about the program to guide them through the participation process and direct them toward appropriate resources. This may often be one-on-one outreach with households.
- Assisting households in selecting contractors and guiding them through the types of questions to ask contractors.
- Reviewing energy assessment reports to discuss results and options for rebates and other sources of funding assistance.
- Advise and assist a homeowner who may be navigating projects performed by multiple contractors (e.g., providing contractor lists, helping set up appointments, and understanding contractor bids).
- Assisting households through the income-verification process.
- Assisting households submitting documentation required to receive a rebate.

The state anticipates releasing a Request for Qualifications to identify CBOs interested in serving as program partners.

The State of Wisconsin also recognizes that the cost of an energy assessment may pose a barrier to participation in the HOMES program. This may be particularly true in low-income households located in DACs. For these reasons, Wisconsin will allow households with incomes less than 80% AMI to include the cost of an assessment as an eligible project cost for HOMES rebate funding.

The State of Wisconsin is also working on the development of project application materials to easily qualify residents of DACs for rebates. Focus will use metrics to track and report on benefits that are delivered in DACs including:

- Number of projects completed in Justice40 DACs.
- HOMES rebate spend (total dollar amount and proportion of program spend) for projects completed in Justice40 DACs.
- Estimated energy savings from projects completed in Justice40 DACs.

The State of Wisconsin plans to make income verification for the HOMES program as easy as reasonably possible to enable participants to receive the maximum incentives they are eligible for. The State of Wisconsin intends to leverage existing Focus processes and procedures in the income-qualification process to facilitate an understandable and user-friendly process. Details of Focus's existing process are described below.

Focus has offered higher incentives to income-qualified residential customers for many years. Beginning January 2024, Focus modified its income qualification process to better align with the IRA HOMES and

HEAR criteria. With this modification, Focus transitioned from using state median income (SMI) as the basis for determining customer income-eligibility to using AMI. Two other major changes in 2024 include allowing self-attestation and nearly instantaneous approval through online forms. Focus had already established processes to allow categorical eligibility for its income-qualified incentives. Customers that are verified as already qualified for the state and federal means-tested programs listed below can receive Focus's higher incentive amounts:

- Wisconsin Home Energy Assistance Program (WHEAP)
- Supplemental Nutrition Assistance Program (SNAP/FoodShare)
- Lifeline Support for Affordable Communications (Lifeline)
- National School Lunch Program – Free (NSLP)
- Housing Opportunities for Persons with AIDS
- Weatherization Assistance Program (WAP)
- Medicaid
- Wisconsin Head Start
- Food Distribution Program on Indian Reservations (FDPIR)
- Housing Improvement Program (HIP)
- Supplemental Security Income (SSI)

For households that are not categorically eligible under one of the aforementioned programs, the Focus program offers an express eligibility option where customers can provide the first two pages of the most recent year's tax form 1040 for each member of the household that earns income. Absent that, Focus will also accept the most recent 30-day proof of income for each member of the household that earns income. This tiered eligibility approach allows participants to verify income via the least time-intensive and burdensome routes available to them. To reiterate, the State of Wisconsin intends to build upon this experience of creating user-friendly income verification processes to reduce barriers in disadvantaged, overburdened communities.

The State of Wisconsin will focus on partnerships with trusted community nonprofits, Community Action Agencies (CAAs) (funded by DEHCR), and landlord associations that overlap with DAC territories to ensure that marketing and outreach of the HOMES program is targeted to DACs. CAAs implement the Weatherization Assistance Program in the state and can offer referrals to households ineligible or that choose not to participate in that program. The State of Wisconsin will work with these CAAs to encourage referrals to households that are good candidates for HOMES.

The State of Wisconsin commits to prioritize building relationships with CBOs in energy burdened and disadvantaged communities. These organizations can serve an important role as promotional partners for the program. Working with trusted community leaders in DACs will be an important strategy for encouraging households located in these communities to participate, especially if they have limited familiarity with energy efficiency programs to date. The State will also prioritize distributing marketing collateral and performing partnership outreach to neighborhood associations located in DACs to spread awareness is spread during the program's early stages, to give households time to plan for energy projects that were previously financially out of their reach. Moreover, the State will engage landlord associations and tenant advocacy groups to explain the program's benefits and the participation pathways available for low-income multifamily housing.

The State of Wisconsin and Focus will track contractor engagement with households located in DACs to determine the amount of program funds flowing to those communities. The program will provide

Registered Contractors a \$200 bonus for each project or dwelling unit located in a Justice40 DAC upon completion and verification of the work done. The State of Wisconsin will develop a publicly available list of Registered Contractors. Only those contractors that have been approved by the State as a Registered Contractor prior to completing the project will be eligible for the DAC bonus incentive. The State of Wisconsin is planning to use the Pacific Northwest National Laboratory (PNNL) Application Programming Interface (API) tool to verify whether the address corresponding to project location is within a DAC prior to approving payment of the DAC contractor bonus incentive. DAC contractor bonus incentives will be tracked in the State's rebate tracking system. For reporting purposes, each DAC Registered Contractor bonus incentive in the rebate tracking system will include a project identification field to allow the State to identify the HOMES project corresponding to the DAC contractor bonus incentive, and vice versa.

Ensuring applicable benefits from the HOMES program flow to DACs:

While not all low-income households are located in DACs, a good proportion of DACs are located in census tracts with average household incomes below the state and county median incomes. By reserving 60% of HOMES rebate funds for low-income households and multifamily tenants, the State of Wisconsin is prioritizing the flow of benefits to households that have faced the highest barriers to participating in existing efficiency programs in the state. The State's outreach and marketing of the program, outlined in Section F1 above and the Education and Outreach Strategy Blueprint is designed to encourage HOMES program participation among households in DACs.

Wisconsin will conduct evaluations to assess the flow of benefits to DACs and measure and report progress toward the goal of ensuring at least 40% of program funding is directed toward projects occurring in DACs. The performance metrics outlined in Section F1 above will be used to indicate whether the state is on track to meet this goal as well as the goal to spend at least 60% of the rebate funds on projects for low-income households. It is the state's goal to target outreach and participation of the HOMES program in DACs prior to and at program launch. Regular tracking and reporting of program performance will provide the state with visibility of its progress toward ensuring an appropriate level of benefits are flowing to DACs and allow the state to adapt its program delivery strategies if metrics are not meeting expectations and goals mentioned in this plan.

Below is a list of benefits the State of Wisconsin will ensure flow to DACs as a result of the HOMES program:

Benefit 1: Decrease in Energy Burden: Energy burden is defined as the percent of household income that is put toward home energy costs. Often, a household is considered "energy burdened" when 6 percent or more of their income is spent on their utility bill(s). The activities in this program will improve home efficiency and reduce energy use, resulting in lower utility bills and decreased energy burdens.

DAC that will benefit: All DACs in Wisconsin will be prioritized for this benefit.

How benefit will be delivered: The primary benefit to be delivered are direct benefits in the form of reduced energy usage resulting in reduced home energy costs. These benefits will be delivered from a combination of program partners including the program administration and implementation team, the program's contractor partner network, CBOs, and state and local governments.

When benefit will be delivered: The benefit of reduced energy usage and costs will be delivered immediately upon completion of a project. These benefits will continue to be delivered to the resident throughout the useful lives of the measures installed.

Milestones toward benefit delivery: Key milestones toward benefit delivery include:

- As mentioned in SMART goals table, develop a list of qualified contractors available to serve residents in DACs and ensuring that this list is easily accessible to potential program participants.
- Development and dissemination of targeted outreach, education, and promotional materials with CBOs in Justice40 DACs.
- Development of project application materials to easily qualify residents of DACs for rebates. Metrics on benefits to track and report when evaluating program include:
 - Number of projects completed in DACs
 - Number of projects completed in census tracts with high energy burdens
 - Estimated energy savings from projects completed in DACs
 - Estimated energy savings from projects completed in census tracts with high energy burdens
 - Customer satisfaction with program
 - Customer self-reported energy bill impacts

Community-based organization(s) to be engaged with when delivering this benefit:

- Aging & Disability Resource Center (ADRC) of Brown County
- Habitat for Humanity – Green Bay
- Neighborworks Green Bay
- House of Hope Green Bay, Inc.
- Paul’s Pantry (Green Bay)
- Century City Triangle Neighborhood (Milwaukee Northside)
- Walnut Way Conservation Corps & Lindsay Heights Neighborhood (Milwaukee Northside)
- Citizen Action WI – Energy Burden Coordinator (Milwaukee Northside)
- Northwest Side Community Development Corporation (Milwaukee Northside)
- Dominican Center (Milwaukee Northside)
- Social Development Corporation (Milwaukee Northside)
- Serving Older Adults, Inc. (Milwaukee North & Southsides)
- Harbor District (Milwaukee Southside)
- 16th Street Health Center (Milwaukee Southside)
- Muskego Way Forward (Milwaukee Southside)
- VIA CDC (Milwaukee Southside)
- UMOS (Milwaukee Southside)
- Revitalize Milwaukee (Milwaukee Southside)
- Reclaim our Neighborhoods (Milwaukee)
- Blacks for Political and Social Action (Madison)
- EcoLatinos (Madison)
- Operation Fresh Start (Madison)
- Sustain Dane (Madison)
- Tenant Resource Center (Madison)
- Urban Triage (Madison)
- Foundation for Black Women’s Wellness (Madison)
- Latino Health Council (Madison)

- Centro Hispano (Madison)
- Latino Academy for Workforce Development (Madison)
- Project Home (Madison)
- Catholic Multicultural Center (Madison)
- Elevate (Madison)
- Urban League of Greater Madison
- CouleeCAP (SE Wisconsin)
- Habitat for Humanity La Crosse (SE Wisconsin)
- Vernon County Energy District
- Living Faith Food Pantry (Viroqua/Vernon County)
- Bethel Butikk Food Pantry and Thrift Shop (Viroqua/Vernon County)
- CORE Community Resources (Bayfield County)
- Cheq Bay Renewables (Bayfield and Ashland Counties)
- Ashland County Aging Unit Inc.
- Ashland Cares Inc.
- Faith in Action Ashland

Benefit 2: A decrease in environmental exposure and burdens: Emissions reduction and associated health benefits of energy efficiency (improved respiratory health and reduced exposure to extreme temperatures and weather).

DAC that will benefit: All DACs in Wisconsin will be prioritized for this benefit.

How benefit will be delivered: The benefit will be delivered to the customer upon project completion, as energy efficiency projects, particularly those that include weatherization measures, can lead to improved indoor air quality and ventilation, improved respiratory health, and reduced risk of mold and moisture-related hazards.

When benefit will be delivered: The benefits of decreased environmental exposures and burdens will be delivered immediately upon project completion. These benefits will continue to be delivered to the resident(s) throughout the useful lives of the measures installed.

Milestones toward benefit delivery: Development of project application materials to easily qualify residents of DACs for rebates. Metrics to track and report on benefits:

- Number of projects completed in DACs.
- Estimated energy savings from projects completed in DACs.

Metrics to track and report on benefits: Wisconsin intends to use the EPA's AVOIDed Emissions and geneRation Tool (AVERT) and Co-Benefits Risk Assessment (COBRA) tool to quantify, track, and report the avoided emissions and health benefits attributable to the program.

Community-based organization(s) to be engaged with in delivering this benefit: See the list of CBOs listed in Sections F1 and C2. In addition, the State of Wisconsin commits to exploring partnership and referral opportunities with the Wisconsin Department of Health and Safety (DHS) Asthma Prevention Team to promote the program to families with records of childhood asthma cases. In preliminary conversations, DHS has shared that weatherization measures are a technology they promote to low-income households with known childhood asthma cases. DHS has expressed an interest in leveraging the HOMES program funding to stretch their healthy home project budget while delivering energy saving benefits to customers at the same time. The State of Wisconsin also commits to ongoing outreach to new CBOs, such as community health clinics and centers, that are engaged in similar work in other DACs throughout the state.

Benefit 3: An increase in quality job creation, the clean energy job pipeline, and job training for

individuals: The Wisconsin HOMES program will serve as a catalyst to supporting a growing clean energy workforce in the state. A strategic program objective is to support long-term workforce development opportunities and leverage IRA contractor training grant funding where possible.

DAC that will benefit: Uncertain at this time, but will be refined, targeted, and reported on as 50123 TREC grants are deployed.

How benefit will be delivered: The HOMES program will deliver opportunities for a trained workforce across the state. Successful deployment of HOMES will increase demand for energy efficient and clean energy technologies, expanding an existing construction workforce while providing new opportunities to build skills in new technologies to differentiate contractors in the market.

Distinct from the workforce goals mentioned above, the State will work to identify at least three CBOs in Justice40 DACs to partner with to connect unemployed and underemployed jobseekers with entry points into clean energy careers. Entry points could be defined as creating a cohort of jobseekers to meet minimum count requirements for existing employer workforce training programs, connections to apprenticeship programs identified through IRA Home Energy Rebates engagement with labor groups, or connections to technical college training programs. While the funding for this work is not yet certain, opportunities for grant funding can be explored.

When benefit will be delivered: Throughout the implementation of the HOMES program, but specifically, benefits will accrue and are anticipated to be measurable after five years of program implementation.

Milestones toward benefit delivery: Engage three CBOs located in DACs to scope opportunities to create and in the future fund clean energy career pipelines.

Metrics to track and report on benefits:

- Net-increase in clean energy jobs in the energy efficiency sector, as reported by the [Clean Jobs Midwest Report for Wisconsin](#).
- Enrollment numbers in labor union apprenticeship programs and in technical college energy efficiency career path courses.
- Enrollment numbers in BPI energy auditor certification program in Wisconsin.

Community-based organization(s) involved in identifying or negotiating benefit or developing plan for benefit delivery:

- Wisconsin Latino Academy of Workforce Development
- The Wisconsin Black Chamber of Commerce
- Silver Springs Neighborhood & Milwaukee Area Technical College