

Energy Efficient Wildfire Rebuilding Incentive Feedback Form

Thank you for taking time to provide feedback to the Oregon Department of Energy on rulemaking for the Energy Efficient Wildfire Rebuilding Incentive Program.

In 2021, the Oregon Legislature passed HB 5006, providing the Oregon Department of Energy with \$10.8 million for a program incentivizing energy efficient rebuilding after the 2020 wildfires. ODOE published draft program rules, and is collecting public comments as part of our rulemaking process. We appreciate any feedback you can provide to help ensure this program works well for survivors and can be successfully administered. Please submit your comments by 5 p.m. on January 7, 2022 so that they can inform revisions of draft program rules before they are finalized.

Options to submit this feedback form:

- 1. An online fillable version of this form is available here: https://odoe.powerappsportals.us/wildfire
- 2. Fill out this PDF form and upload it online here: https://odoe.powerappsportals.us/wildfire
- 3. Fill out and email this PDF form to Wildfire.Recovery@energy.oregon.gov
- 4. Fill out this form, print it, and mail to: Energy Efficient Wildfire Recovery Incentive Program | Oregon Department of Energy | 550 Capitol St. NE | Salem, OR 97301

Instructions

To support your participation in this rulemaking process, we have posted a <u>two-page summary</u> with background information about Oregon's building codes, legislative requirements and context, and options in program development. We also have prior webinar materials and recordings posted on ODOE's website.

Your feedback on the draft rules and answers to the questions that follow will play a critical role in helping the state better understand perspectives and options for how the Energy Efficient Wildfire Rebuilding Incentive Program could work. Please review our <u>draft program rules</u> – in this online form, you'll see we have included questions about a few specific areas where we are looking for feedback. At the end of the form, you will also have an opportunity to add comments about other parts of the program that interest you. On the pages ahead, you will find three categories of questions:

Equity and Access

Your Contact Info

- Eligibility and Higher Incentives for Low- and Moderate-Income
- Heat Pump Installations in Manufactured Homes

If you run out of room in this form, please feel free to attach additional pages.

Name:	Organization:
Email:	Phone:
Address:	

Equity and Access

Equity is an important part of the state's work. ODOE is considering equity when developing administrative rules for this program incentivizing energy efficient rebuilding after the 2020 wildfires. Equity requires us to acknowledge that everyone may not be starting from the same place and we are more likely to achieve fairness in outcomes if we strive to provide different types or levels of support based on individual or community needs.

a.	Do you have suggestions for how these rules can better promote equitable outcomes through
	this program?

b.	Are there any provisions in these draft rules that you think may create a barrier to accessing
	this program while rebuilding homes or structures?

Low- and Moderate-Income Program Participation

The Oregon Department of Energy recognizes that lower-income wildfire survivors may need additional resources in order to rebuild. The draft program rules provide a higher level of financial incentives to low-income homeowners. In the draft rules, homeowners can demonstrate that they qualify for the higher incentive if they were eligible at any time in the previous three years for the following Oregon Housing and Community Services Department programs:

- (a) Low Income Home Energy Assistance Program (LIHEAP).
- (b) Oregon Energy Assistance Program (OEAP).
- (c) Low Income Weatherization Assistance Program (LIWAP).

Or at any time in the past seven months for one of the following Oregon Department of Human Services or Oregon Health Authority programs:

- (a) Supplemental Nutrition Assistance Program (SNAP).
- (b) Oregon Health Plan (OHP) (Medicaid).
- (c) <u>Children's Health Insurance Program</u> (CHIP; this option is available only for households consisting of six or fewer people).

This co-eligibility pathway is consistent with other incentive programs at the Department. We welcome feedback on whether this approach would work well for this new program.

In addition, the Department is evaluating whether a higher level of financial incentives should also be made available to moderate-income households. Under ODOE's existing Solar + Storage Rebate
Program, "moderate income" is defined as those with household income less than or equal to 100 percent of state median income adjusted for household size. Creating a higher level of financial incentives for moderate-income homeowners would provide additional resources to those rebuilding, but would also introduce additional complexity into the program.

enti	of state median income adjusted for household size. Creating a higher level of financial ves for moderate-income homeowners would provide additional resources to those rebuilding, buld also introduce additional complexity into the program.
a.	We welcome feedback on whether a higher level of financial incentive should be available for survivors who are moderate-income.
b.	Do you have information you would like to share on the construction costs of building to code o above code?
C.	If a moderate-income incentive level is created, is the definition above appropriate for this program or do you have an alternative definition you recommend?
d.	In the Solar + Storage Rebate Program, applicants must provide a tax transcript from the Oregon Department of Revenue to prove eligibility for the higher incentive. Is there alternative information or documentation that could be provided by an incentive applicant to demonstrate they meet low- or moderate-income requirements?

Heat Pump Installations in Manufactured Homes

The draft program rules provide incentives for homeowners rebuilding their manufactured homes to have a heat pump system installed in their new or previously-owned manufactured home. Homeowners may install the heat pump system themselves and qualify for an incentive from ODOE. However, many utility programs also offer heat pump incentives but require installation by a qualified contractor to receive the incentive – so allowing self-installation in ODOE's program may disqualify them from receiving those additional benefits from utilities. On the other hand, there may not be availability of contractors in some parts of the state and allowing self-installation could promote greater access to this program.

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d.	Should the program	rules allow r	nanuractureu	nomeowners to	sen-mstan neat	Pumb Systems:

Additional Feedback

Do you have any comments regarding the draft program rules that are not related to the questions shared by ODOE? Please share any additional feedback you have about the draft program rules.