



**Georgia Environmental Finance Authority
Community Benefits Plan
IRA Section 50121**

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Introduction

This Community Benefits Plan, in alignment with the U.S. Department of Energy’s (DOE) guidance¹, details the Georgia Environmental Finance Authority’s (GEFA) approach to Community Benefits Plan requirements as defined by DOE and under the Inflation Reduction Act (IRA) Section 50121. As required by DOE guidance, this plan overviews the Georgia Home Energy Rebate Programs’ approach to incorporating and measuring progress on the following four objectives: supporting meaningful community and labor engagement, engaging and supporting a skilled and qualified workforce, advancing diversity, equity, inclusion, and accessibility (DEIA), and contributing to the Justice40 Initiative². This Community Benefits Plan details specific commitments related to each of the outlined objectives and describes the way in which stakeholder feedback and input have informed and helped shape Georgia’s Home Energy Rebate Programs’ design. The key goals of Georgia’s Home Energy Rebate Programs are to reduce the energy burden for all Georgians, increase the quality and comfort of homes across the state, ensure statewide accessibility to the program, ensure customer and contractor satisfaction, and sustain a contractor workforce.

GEFA is committed to providing the public with clear and transparent information about progress made related to the commitments outlined in this Community Benefits Plan. GEFA’s Community Benefits Plan, in its entirety, will be prominently displayed and accessible on GEFA’s public-facing website. This public-facing information will include all community benefits commitments and periodic progress updates related to the commitments outlined throughout this plan.

Objective 1: Engage Community and Labor

Category and Commitment	Year 1	Year 2	Year 3	Year 4	Year 5
Community and Labor Engagement					
Offer a minimum of six feedback sessions with community and/or labor groups each year in various parts of the state (including virtual options for those that cannot attend in person).	# and locations of sessions	# and locations of sessions	# and locations of sessions	# and locations of sessions	# and locations of sessions

Table 1. Engage Community and Labor SMART Goal

A. Public Input Approach

From the outset, GEFA has prioritized soliciting a diverse array of feedback on Georgia’s Home Energy Rebate Programs, including engaging with several organizations to ensure meaningful community and labor engagement. GEFA has engaged with select nonprofits, retail groups, energy providers, contractors, and public entities. Below is a list of engagement sessions to date:

Distributing Updates through GEFA’s Website

GEFA is using its public-facing website to provide relevant programmatic information on Georgia’s Home Energy Rebate Programs, and to solicit feedback from the public on the programs’ design. GEFA’s website includes an option for the public and contractors to sign up to receive updates on the Georgia Home Energy Rebate Programs;

¹ See [Community Benefits Plan Requires Elements and Sample Responses](#) guidance document issued in June 2024

² Aligned with the Department of Energy’s goal that that 40% of the overall benefits of certain federal investments flow to disadvantaged communities. See DOE’s Guidance on the Justice40 Initiative; [Justice40 Initiative | Environmental Justice | The White House](#)

these mailing lists currently have more than 1,500 subscribers. The mailing lists will be used to provide periodic updates about the program, events, training, and opportunities for public input.

Providing Opportunities for Public Comment through a Public Survey

GEFA developed a public survey to collect public feedback and input for the Georgia's Home Energy Rebate Programs design. Over a month, GEFA received more than 154 responses, 60 of which were from stakeholder groups such as contractors, nonprofits, and manufacturers. 71 percent of respondents identified as homeowners, and 78 percent were interested in both HER and HEAR rebate programs. 105 respondents provided unique questions and feedback.

Conducting a Public Webinar

GEFA hosted a public webinar on April 29, 2024, to inform and solicit community input on Georgia's Home Energy Rebate Programs plan. The webinar presentation is available on GEFA's website. GEFA widely publicized the webinar, provided an email sign-up on its website, and asked partners and stakeholders, such as Georgia Power and the Conditioned Air Association of Georgia, to distribute the registration link to their contact lists. More than 200 Georgians attended the webinar, including homeowners, contractors, and representatives from utilities, local organizations, and government entities. The webinar outlined the rebate program start dates, rebate eligibility requirements, amounts, contractor requirements, GEFA's plan to provide statewide access, and ways to stay informed of program developments.

The webinar allowed GEFA to present a high-level summary of the rebate program to the public, understand which stakeholders have an early interest in the program, and gather additional questions and comments. It also allowed GEFA to conduct a gap analysis of stakeholder attendance and program understanding. The [public webinar live recording and presentation](#) are posted on GEFA's rebate program website. The questions submitted during the webinar were merged with the survey questions and will be incorporated into a comprehensive and iterative FAQ document for the program website.

Targeted Stakeholder Interviews

GEFA engaged with key stakeholders, including energy providers, nonprofits, retail groups, contractors, and public entities, to conduct informational and program design interviews. Eleven stakeholders replied and were interviewed; the complete list of stakeholders can be found in the Stakeholder Interview Roster in [Appendix A](#). The interviews provided an opportunity to solicit program design input for Georgia's Home Energy Rebate Programs while engaging directly with key organizations whose participation will be critical to rebate program success. During the interviews, stakeholders highlighted need/desire for:

- Information and data sharing,
- Cross-marketing opportunities with formal programs and community networks,
- A strong plan to reach disadvantaged communities and the harder to reach communities, such as rural communities,
- Collaboration to improve and sustain a qualified workforce, and
- Opportunities for collaboration and partnerships to ensure to the success of Georgia's Home Energy Rebate Programs.

Facilitating Stakeholder Roundtables

GEFA planned and executed four stakeholder roundtables to solicit input on the design of Georgia's Home Energy Rebate Programs. Roundtables are facilitated as a discussion and allow for more in-depth exploration of the program

design details. The full Stakeholder Roundtable Schedule can be found in [Appendix B](#). The GEFA stakeholder roundtables included:

- Key Stakeholder Roundtable – The first public stakeholder engagement, which convened utility, community, government, and retail actors. The purpose of this roundtable was to collect initial reflections and concerns on program design. Topics included rebate thresholds, contractor networks, disadvantaged communities, and approach to multifamily building participation.
- Georgia Power Workshop – Georgia Power serves approximately 60 percent of Georgia residents and has the largest existing energy efficiency program in the state. GEFA engaged Georgia Power in a tactical program design session to discuss rebate stacking, data sharing, contractor networks, marketing, and outreach to low-income customers.
- Community Groups and Nonprofits – GEFA met with community groups, nonprofits, and public sustainability officers to discuss program design specific to disadvantaged communities, categorical eligibility requirements, and the community benefits plan. Participants were polled on education and outreach strategies and tools.
- Electric Membership Cooperatives – Scheduled for the end of June, GEFA will meet with EMCs to provide an overview of the program and discuss rebate stacking, data sharing, contractor networks, marketing, and outreach to low-income customers.

Participating in Stakeholder and Community Events

In addition to facilitating its own events, GEFA and the Georgia Home Energy Rebate Programs team participated in a variety of stakeholder and community events and were available to discuss and present program information and solicit program design input. A table of stakeholder and community events can be found in [Appendix C](#).

Engaging with Contractors and Workforce Development Centers

GEFA has also prioritized engaging with key labor stakeholders, this engagement includes:

- BPI Training Organizations – Everblue and Southface have been identified as national and local entities that provide BPI Building Analyst Professional certifications to interested contractors who would like to join the program. Pricing has been obtained to determine cost effectiveness. Prices may vary depending on time of year, existing special pricing, demand, and availability.
- Existing Energy Efficiency Program Participating Contractor Networks – There have been ongoing discussions with existing utility programs to align on participating contractor eligibility, quality assurance policy and procedure, and rebate requirements. As of May 30, 2024, program staff have presented the program to most of the contractors who are active in the Georgia Power programs, as well as at the CAAG Annual Conference and the National Home Performance Conference in April 2024.

B. Incorporation of Public Input into Program Design

GEFA recognizes the importance of leveraging public input and incorporating feedback into program design. GEFA utilized the various engagement sessions referenced above to: (1) identify the key parties that are engaging early and expressing interest in the program, (2) solicit and address feedback and questions, and (3) identify potential gaps or issues in rebate program design. Early stakeholder engagement and GEFA's public survey illuminated several common themes for consideration in the program design phase:

- Timing of rebate availability, and the process for retroactive rebate applications.
- Contractor requirements and how Georgians will find qualified contractors.
- The program process for verifying income eligibility and rebates amounts.
- How GEFA will protect consumers against artificial increases in pricing.

- Clarification on single and multifamily eligibility requirements.

Development of Resources and Frequently Asked Questions

Questions that arose from initial stakeholder engagement were reviewed and distilled into a preliminary FAQ draft for the program. Any questions that were not easily answered were posed to the specific internal subject matter expert teams spanning various business areas, e.g., technology, program design, consumer benefits, contractors, and housing. These teams deliberated collaboratively to determine process and program design for the customer journey.

Program Design Adjustments

In addition to relying on feedback to inform key program resource materials, GEFA is also integrating stakeholder feedback into program design and adjusting specific design elements to better align with the stated needs and concerns of key stakeholders. GEFA is focused on: (1) improving available rebate program information and the accessibility of the application process, (2) assessing the impact of program design on Georgians in regions with the lowest Area Median Income (AMI), and (3) identifying barriers and opportunities related to contractor engagement.

In terms of improving publicly available rebate program information and ensuring the application process is accessible, GEFA is making the following program design considerations:

- Ensuring program information and outreach materials are available in multiple languages, including the rebate application, contractor outreach and training, and general outreach materials.
- Providing programmatic materials through multiple channels, ensuring digital materials are mobile-friendly so users can rely on cellular service rather than internet access to engage with the program. Mobile-friendly processes will also allow customers to easily upload required documentation using phone cameras.

When it comes to assessing the impact of program design on Georgians in regions with low AMIs, GEFA aims to ensure the Georgia Home Energy Rebate Programs are accessible to individuals at all income levels. GEFA understands that for a low-income or very low-income household, the upgrade cost may be a disproportionately high percentage of the household's annual income and may necessitate tailored program design considerations. Program design considerations include:

- Increasing HER rebate caps for applicants at less than 80 percent AMI.
- Considering alternative funding sources to support efficiency upgrade expenses, where no other incentives exist.
- Examining the multifamily approach and considering the multifamily finance process to build a customer journey that is simple and streamlined.
- Developing a measured pilot program for HER to see if rebate levels can be increased based on measured savings for low-income households.

In terms of identifying barriers and opportunities related to contractor engagement, GEFA has worked to understand the geographic distinctions that demand tailored program design. This includes:

- Based on findings about Georgia's demographics, it is apparent that utility programs and contractor engagement is more active in and around the urban areas of the state. Rural areas generally see less focused advertising to educate homeowners and contractors to available resources, and they have less access to training resources and contractors focused on energy efficiency upgrades.
- The program will strive to ensure engagement of rural households and contractors by providing direction to educational resources, provide broad advertising throughout the state about the opportunities and benefits of the program, and provide all resources in multiple languages.

C. Ongoing Community Engagement Plan

As part of GEFA's ongoing community engagement plan, GEFA will continue soliciting and responding to feedback from key stakeholders, including the public and community groups. This relates to GEFA's Community and Labor Engagement SMART goal of offering a minimum of six feedback sessions per year. These sessions will take place across the state and will include virtual attendance options for those who cannot attend in person. The previously mentioned engagement activities and approaches have provided channels for constructive program design feedback, which will continue for the program's duration. GEFA will employ several tactics to meet this goal:

- **Maintain engagement with stakeholders and partners:** GEFA will continue to engage with utilities, local governments, and community organizations to maintain a mutually beneficial information exchange. GEFA will depend on its partners to provide real-time feedback as the program is launched and implemented. These partnerships will also be leveraged to provide program updates, engage in outreach, and distribute educational materials.
- **Maintain an updated program email list:** Any Georgian interested in receiving program updates can join an email list via the program website. GEFA will use this email list to distribute program updates, share surveys, and request feedback. This list will be periodically scrubbed and accessed to ensure any participants that no longer wish to receive program updates are removed.
- **Establish a program call center:** A call center will provide a direct communication channel for Georgia residents, and access to program information for anyone without digital access. The call center will provide program information, answer frequently asked questions, help identify contractors, and provide instructions on how to navigate the program website and application. The call center will provide two-way communication, ensuring the program team is aware of common questions and challenges posed by the public and contractors. In addition, the call center will be used to escalate issues and concerns to program staff.
- **Participate in community events:** Attendance at community events will allow GEFA's rebate program staff to receive direct feedback from the community. In addition, GEFA maintains an open-door policy for feedback from community organizations. These stakeholder partners have deep connections to the community and will provide critical feedback from the communities they serve.
- **Continue to solicit feedback from contractor networks:** Account managers will be in constant communication with participating contractors and will track feedback throughout the program's duration. Additionally, various tools and events, such as surveys, lunch and learns, focus groups, and quarterly webinars and training sessions, will be used to share best practices and solicit feedback focused on various parts of the program, i.e., homeowner communication, QA/QC process, application process, etc.

D. Outreach Strategies for Target Groups

GEFA understands the importance of employing a multi-faceted approach to ensuring Georgia's Home Energy Rebate Programs are accessible to and benefit the various relevant target groups – contractors, disadvantaged communities, and low- and moderate-income households. Beyond the ongoing engagement activities outlined above, certain approaches must be tailored to address the specific needs of certain communities. GEFA aims to engage in targeted outreach through:

Continuing webinars and roundtables to share program information and solicit feedback.

GEFA is finding that stakeholders engaging with the program are eager to provide input and feedback. Stakeholders often identify other stakeholders that may have insights that could benefit the program, thus GEFA will continue to hold webinars and roundtables throughout the program design and implementation phases. Once program design is complete, GEFA will use these channels to share information about the program requirements, distribute the qualified

contractors list, share outreach materials and strategies, and solicit feedback on the consumer experience. GEFA may utilize these channels to test messaging, receive real-time feedback on the program, and address application process challenges for contractors and rebate applicants.

Provide program updates through GEFA's website and email lists.

It is essential GEFA provides a central resource for Georgia residents, contractors, utilities, and other stakeholders to find the most up-to-date program information. GEFA will create a program website that will be updated regularly, provide email sign up lists for residents and contractors, and distribute sharable digital content about the program.

The website will provide:

- Rebate information, including eligible measures, rebate amounts, and a rebate process overview.
- Program FAQs.
- A list of qualified program contractors.
- Contractor information, including eligibility requirements and training opportunities.
- A public comments section to solicit ongoing feedback.

Provide program outreach resources that can be shared and replicated by program partners.

To ensure Georgia's Home Energy Rebate Programs are easy to understand and the application process is seamless for Georgia residents and contractors, GEFA will provide centralized messaging materials for distribution to stakeholders, contractors, and Georgia residents. By providing a source for simple, common language, GEFA will promote consistent messaging throughout the state. This will increase trust and engagement with the program.

These materials will include:

- Educational materials – GEFA will distribute DOE educational materials, such as videos about heat pumps, to educate Georgians on the technologies and services covered by the rebate program.
- Template texts for digital distribution – This may include template social media posts, email content, and announcements that can be used by program partners.

Engage contractors through informational and recruitment activities.

Throughout the duration of the program, communication and outreach strategies will be developed and refined. These strategies will be tailored to the specific demographics and needs of the various types of contractors, represented by the 9000+ listed contractors throughout the state. Account managers and education and outreach specialists will strategically reach out to contractors in all areas of the state, with special focus on those working in underserved areas of Georgia, specifically serving disadvantaged communities, or those who are willing to travel statewide. The implementation team will provide the trade network with information on program participation requirements, access to BPI resources if not already certified, and information on target locations. The following recruitment activities will be incorporated into ongoing outreach efforts:

- Schedule ongoing quarterly contractor webinars and training sessions to ensure outreach extends beyond the initial program stages.
- Recruit and employ statewide account management team to focus on specific regions, organizations, and contractors. These groups include, but are not limited to:
 - Conditioned Air Association of Georgia (statewide and regional)
 - Hispanic Contractors Association/Agenda Latina
 - HVAC and Plumbing Distributors
 - Trade unions
 - Manufacturers
- Participate in at least 12 annual community events across the state of Georgia to support and educate homeowners on how the program can benefit them and what to expect from contractors and home upgrades (See the Engage Community and Labor SMART Goal in Table 1)

- Ensure that there are contractors available to serve all 159 counties in Georgia.

Deploy various engagement channels to support adequate engagement among disadvantaged communities.

In alignment with DOE’s requirement that Georgia’s Home Energy Rebate Programs serve low-income and disadvantaged communities, as well as GEFA’s goal to ensure program benefits accrue to all Georgians, GEFA will rely on a targeted outreach approach for disadvantaged communities. This will include:

- Affordable housing providers: GEFA will collaborate with the Georgia Department of Community Affairs, as well as other local public housing authorities to identify low-income residents and eligible multifamily buildings that would benefit greatly from program upgrades.
- Community-based organizations: In collaboration with community-based organizations (CBOs), GEFA will host events and workshops to raise awareness about the rebate programs and provide assistance with rebate requests. These events will be tailored to the specific needs and interests of each community.
- Mobile outreach units: Deploy mobile outreach units, or boots-on-the-ground teams, to bring information and resources directly to disadvantaged communities. These units or teams can be equipped with educational materials, application forms, and staff trained to assist with the rebate programs enrollment process.
- Faith-based organizations collaborations: Collaborate with faith-based organizations to promote the rebate program to their congregations. Host information sessions and enrollment events at places of worship to reach a diverse range of community members.
- Libraries or other accessible locations: GEFA will collaborate with public libraries and other accessible community locations, i.e., community centers, town halls, recreation centers, to host information sessions and enrollment events for communities across Georgia.

Objective 2: Engaging and Supporting a Skilled and Qualified Workforce

Category and Commitment	Year 1	Year 2	Year 3	Year 4	Year 5
Investing in Job Quality and a Skilled Workforce					
Coordinate four certification and/or training opportunities a year throughout Georgia to enable interested contractors to become certified as a BPI Analyst Professional, attain CEUs for existing certification holders, or gain practical knowledge of program and measure requirements.	List of trainings held	List of trainings held	List of trainings held	List of trainings held	List of trainings held

Table 2. Engaging and Supporting a Skilled and Qualified Workforce SMART Goal

GEFA strives to support a well-qualified, skilled, trained, and stable workforce to enable high-quality jobs within the home energy upgrade industry. The shortage of talent throughout the country, and particularly in the southeast, has led to strong competition amongst contractors, especially HVAC contractors, who commonly see turnover as technicians move from company to company in search of better pay and more comprehensive benefits packages.

A. Partnering with Responsible Contractors

Throughout the course of the program, account managers will have consistent engagement with the participating contractors to provide support, relay programmatic updates, schedule QA/QC inspections, and address any issues that may arise in the field. GEFA will develop and rely upon a “responsible contractor” policy that sets forth specific criteria for contractor participation in the rebate programs. Initial requirements associated with this policy include a background check for any contractor entering a home, BPI Analyst Professional certification, completion of an internal training covering program and application requirements, and signing the program/contractor participation agreement. These steps ensure an engaged and qualified contractor network to serve the Georgia residential

community. Development and formalization of relevant training will occur during initial program stages and will be ongoing for the rebate programs.

Additional actions to further ensure recruitment goals and continuity of installation standards are as follows:

- Account management will aim to directly connect with 20-25 contractors (of the 9000 registered in Georgia) per week during the ramp up phase of the program, and at least 500 per year for the duration of the program.
 - This will include targeted outreach to contractors located in and serving disadvantaged communities.
- Assist in scheduling and coordinating incremental certification and training for existing and new contractors.
- Utilize QA/QC visits to ensure a high level of work is being accomplished and to provide an opportunity for transfer of knowledge and mentorship in the field.
- Plan and hold regular monthly events to discuss challenges in the field, share best practices, encourage continuous improvement of work skills through industry training, and share benefits of participation in the program. These might include:
 - Counter days at distributor locations to network.
 - Distributor/manufacture presentations: To help inform participants of new technologies coming onto the market, manufacturers' recommendations, challenges/benefits of stocking certain products, for instance.
 - Conferences, lunch and learns, quarterly webinars/trainings, etc.

B. Workforce Education and Training Support

To meet the program's workforce needs, GEFA will engage with workforce-specific organizations throughout Georgia to enlist participating contractors. GEFA will focus on targeting contractor entities that are familiar with energy efficiency portfolio measures (HVAC, building envelope, plumbing and electrical work) or are already engaged in existing energy efficiency programs. Programmatic training will be provided to engage, and recruit interested businesses to participate. GEFA's goal is to create a robust participating contractor network totaling 80 to 90 companies or individuals able to perform upgrades within homes throughout Georgia. GEFA will utilize various cross promotion, trade ally networking, and retail strategies to increase uptake of the Home Energy Rebate Programs. Georgia has an existing list of trade ally entities throughout the state that will be utilized for both program promotion and workforce development.

Program implementors will coordinate with key industry stakeholders to ensure a strong foundation for the program. GEFA will rely on these entities for training and recruiting qualified contractors, for educational resources, for identifying best practices specific to each upgrade, and highlighting geographic locations relevant to program marketing among key workforce and industry contributors. The program will rely on existing contractor networks and participating program contractors of large and small utilities across the state to "jumpstart" the program during the initial launch phase.

GEFA will establish and strengthen relationships with key organizations by engaging with their public affairs and community engagement staff and providing key program information for dissemination. Examples of those key organization types are as follows:

Government Entities:

- **Technical College System of Georgia:** TCSG oversees the state's technical colleges, adult literacy programs and a host of economic and workforce development program.

Trade Unions and Organizations:

- **IBEW Local 613:** A union who works to promote the electrical industry in Atlanta.
- **Independent Electrical Contractors Atlanta and Georgia Chapters:** IEC provides many services to contractors who are independent. From training to worker recruitment, group health and retirement plans, networking, discounts, etc.
- **Conditioned Air Association of Georgia:** CAAG is a state-wide, nonprofit trade association which represents heating, ventilation, air conditioning and refrigeration contractors (HVAC-R) who work on residential, commercial, and industrial construction projects.
- **Plumbing Heating Cooling Contractors of Georgia:** PHCC members are dedicated to protecting the health and comfort of the public by promoting industry education and improving consumer relations with professionalism and integrity.
- **Southeast Energy Efficiency Alliance:** SEEA promotes energy efficiency as a catalyst for economic growth, workforce development, and energy security across the southeast. SEEA's work revolves around advancing energy efficient policy within the built environment and transportation sectors.
- **Georgia Hispanic Construction Association:** The GHCA provides education and business development resources to help small and medium-sized construction firms to build a stronger business foundation.

Nonprofit and Community Groups:

- **Goodwill Industries:** Goodwill provides free career counseling, skills training, and resume prep services that help unlock opportunities for job seekers.
- **Southface:** Southface is a nonprofit with a mission to promote sustainable homes, workplaces, and communities through education, research, advocacy, and technical assistance.

For-profit Corporations

- **BlocPower:** BlocPower is a climate technology company that analyzes, finances and upgrades homes and buildings.
- **Mitsubishi Electric:** Equipment manufacturers have a huge role in these projects and have their own contractor networks who stand to benefit from IRA.
- **Southern Company/Georgia Power:** The existing energy efficiency program participating contractor network at GPC will be a significant source of new contractors into the program.

GEFA will implement TREC (Training for Residential Energy Contractors) to ensure consistent and quality training for the workforce across Georgia and promote growth in the building industry. This program will engage community and labor stakeholders to comprise a workforce advisory group that focuses on closing workforce gaps identified throughout the state. Plans for engagement will include various group discussions covering program design, program progress, ongoing efforts, and funding opportunities. The goal is to increase transparency and accountability, manage expectations, increase engagement, and produce plans for strong and enduring partnerships, all while satisfying Justice40 targets.

The Building Performance Institute (BPI) will also play a key role in providing both a foundation for qualified contractors and for savings calculations. Participating contractors must be, at minimum, certified as a BPI Building Analyst. This ensures consistent building science knowledge and reliance on best practices across the board.

As mentioned above, contractors are best engaged through a knowledgeable network of account managers whose role it is to consistently educate and engage both customers and contractors, assist with customer questions and applications, and provide insight into workforce development opportunities. However, there are many other ways to engage networks effectively. The list below includes several examples of informational sources that will align all participating entities with the standards and guidelines of the program. The various materials provided will ensure clear and consistent messaging across all entities, utilize topic-specific, expert information and best practices from across the industries, and allow for brand recognition for both contracting entities and homeowners/tenants.

- **Program Website:** Contractors will be able to locate and request to participate in the program using the state implementation website.
- **FAQs:** Field service teams and account managers will be equipped with FAQ documents for contractors who engage with customers.
- **Blog Content:** Outreach partners will be provided with short-form blog content to post to their digital channels that includes information on contractor participation and guidelines.
- **Organization Publications** Outreach partners will be provided long-form written content and accompanying graphics to publish in their respective that targets and informs contractor participants.
- **Collateral Handouts and Support Materials:** Field service teams and account managers will be equipped with supplemental marketing collateral materials for contractors to provide to program participants in the field.
- **Ongoing Trainings:** Ongoing certification and/or training opportunities will be held across Georgia to enable interested contractors to become certified as a BPI Analyst Professional, attain CEUs for existing certification holders, or gain practical knowledge of program and measure requirements.

Objective 3: Advancing Diversity, Equity, Inclusion, and Accessibility (DEIA)

Category and Commitment	Year 1	Year 2	Year 3	Year 4	Year 5
Diversity, Equity, Inclusion, and Accessibility					
Confirm and map contractors' service territories to ensure accessibility in all disadvantaged communities, tracking areas in need of increased targeting.	# of contractors in each of the relevant service territories or counties	# of contractors in each of the relevant service territories or counties	# of contractors in each of the relevant service territories or counties	# of contractors in each of the relevant service territories or counties	# of contractors in each of the relevant service territories or counties
Directly engage with four women-owned, veteran-owned, minority-owned businesses per year.	List of businesses engaged	List of businesses engaged	List of businesses engaged	List of businesses engaged	List of businesses engaged

Table 3. Advancing DEIA SMART Goal

A. Partnerships with Underrepresented Businesses and Inclusive Training Organizations

GEFA is committed to increasing diverse representation and engagement, sustaining a culture and environment of inclusion, and identifying and addressing barriers that limit fair access to opportunities. To incorporate these objectives into the program, the program will rely heavily on the account management team to network throughout the state, engaging various minority business, especially those in the underserved areas. The account management team will create and execute strategies that impact key performance indicators, objectives, and desired results such as:

- Goals and definitions of diversity components will be addressed in the contractors' initial training protocol.
- GEFA will implement TREC (Training for Residential Energy Contractors) to ensure consistent and quality training for the workforce across Georgia and promote growth in the building industry. This program will engage community and labor stakeholders to make up a workforce advisory group that focuses on closing the workforce gaps identified throughout the state. Plans for engagement will include various group discussions covering program design, program progress, ongoing efforts, and funding opportunities, to name a few. The goal is to increase transparency and accountability, manage expectations, increase engagement, and produce plans for strong and enduring partnerships, all while satisfying Justice 40 targets.

- Targeted increase in the number of Minority Business Enterprises (MBEs) involved in the Georgia Home Energy Rebate Programs. This may include contractors, subcontracts, vendors, etc.
- Recruiting Women-owned Business Enterprises (WBEs) and woman-led organizations by engaging organizations and companies such as:
 - Georgia Department of Economic Development
 - Greenlight Lighting Corporation
 - Women of HVAC
- Recruiting veteran-owned businesses by engaging organizations such as:
 - Georgia Veterans Education Career Transition Resource Center (GA VECTR)
 - Veteran Owned Business Directory
- Utilizing workforce education and training programs, as well as career development centers. GEFA will specifically target those programs and institutions that engage with and serve underrepresented populations, including people of color, women, and veterans. This will assist with contractors looking to hire for positions associated with the rebate programs. These organizations could include:
 - Southface
 - Technical College System of Georgia
 - Georgia Hispanic Contractors Association

B. A Data-Based Approach to DEIA

Beyond engaging with underrepresented businesses and training organizations that serve and engage disadvantaged communities, GEFA is also committed to incorporating key metrics into the rebate programs. This data-centered approach will allow GEFA to address program design and operations in a targeted and nimble manner. Where feasible, Georgia’s Home Energy Rebate Programs will track relevant customer and contractor metrics related to household income, race and ethnicity, community type (i.e., rural, suburban, urban), housing type (i.e., single family, multifamily), and household type (i.e., renter, homeowner).

GEFA will plan to utilize varied media (direct mail, community events, digital advertisements, etc.) to ensure information is accessible and reaches diverse communities and age groups. Some key considerations when developing program materials include:

- Digital Equity – ensuring communities with varied levels of access to the internet and online resources can also obtain program information and materials.
- English as Second Language – ensuring that ESL communities have access to program documentation and materials in their relevant language. Given the demographic landscape of Georgia, providing materials in Spanish will be particularly important.
- Other Socioeconomic Indicators and Gaps

Objective 4: Address the Justice40 Initiative

Category and Commitment	Year 1	Year 2	Year 3	Year 4	Year 5
Justice40 Initiative					
Ensure a minimum of 20 percent of completed jobs/upgrades by contractors are in disadvantaged communities.	# of completed jobs/upgrades by contractors disadvantaged communities	# of completed jobs/upgrades by contractors disadvantaged communities	# of completed jobs/upgrades by contractors disadvantaged communities	# of completed jobs/upgrades by contractors disadvantaged communities	# of completed jobs/upgrades by contractors disadvantaged communities

Distribute post-project benefit surveys to participants who receive upgrades at least twice annually.	2 rounds of surveys per year	2 rounds of surveys per year	2 rounds of surveys per year	2 rounds of surveys per year	2 rounds of surveys per year
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Table 4. Address the Justice40 Initiative SMART Goal

The Justice40 initiative is an effort put forth by the federal government to deliver 40 percent of benefits from federal climate and infrastructure investments to historically underserved and overburdened communities. The initiative aims to correct historic underinvestment in communities that have been disproportionately impacted by climate burdens and economic inequality, particularly low-income communities, and communities of color. GEFA is approaching the Justice40 initiative with precision to deliver 40 percent of the benefits of Georgia’s Home Energy Rebate Programs to Georgians most in need. By leveraging a clear framework in its approach to the Justice40 initiative, GEFA will: (1) identify disadvantaged communities in need of investment, (2) define measurable benefits and metrics to benchmark progress, (3) develop a benefit tracking tool to visualize and measure progress, and (4) establish oversight and accountability to support strategic goals.

GEFA’s SMART goal of ensuring a minimum of 20 percent of completed jobs/upgrades by contractors are in disadvantaged communities is just one way that GEFA intends to approach the Justice40 initiative. Beyond actually delivering upgrades in disadvantaged communities, GEFA will also deliver indirect benefits to DACs, such as the training and upskilling of workers, and providing competitive wages to program workers from low-income and disadvantaged communities. The combination of both direct and indirect benefits will allow GEFA to meet the 40% target associated with the Justice40 initiative. GEFA’s second SMART goal, pertaining to post-project benefit surveys, aims to track GEFA’s progress towards delivering program benefits effectively. The program will have two rounds of post-project surveys each year. For example, Round 1 will capture and survey all DAC households that participated in Q1 and Q2, Round 2 will capture and survey all DAC households that participated in Q3 and Q4 (this will repeat each Program Year). The purpose of these post-project benefit surveys is to capture and measure the direct and indirect benefits delivered to households in low-income and disadvantaged communities.

A. Definition of Disadvantaged Communities

GEFA will use the following definition of a disadvantaged community (DAC) in accordance with DOE: disadvantaged communities are low-income households located in a disadvantaged community (i.e., census tract) as identified by the Climate and Economic Justice Screen Tool (CEJST). The CEJST tool identifies census tracts that are overburdened and underserved as being disadvantaged; these determinations are based on six categories of burdens. A community is highlighted as disadvantaged on the CEJST map if it is in a census tract that is (1) at or above the threshold for one or more environmental, climate or other burden, and (2) at or above the threshold for an associated socioeconomic burden. The “burden” categories include climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. Additionally, federally-recognized tribes are also considered disadvantaged communities. Using the CEJST tool and DAC definition, 145 counties in Georgia are considered disadvantaged communities. Contractors and other interested parties can use the CEJST mapping tool or another federally approved web-based tool to determine whether a home is in a disadvantaged community.

B. Method to Encourage Delivery of Home Efficiency Rebates to Disadvantaged communities

Track Disadvantaged Community Project Status

To encourage program participation in disadvantaged communities (DAC), GEFA will provide contractors with a financial incentive for projects completed within a DAC. To ensure the process is clear, contractors and homeowners will receive a notification of DAC status at the time of the application pre-approval within the application portal. When

a project is included in a DAC, this notification will also include additional installation incentives eligible for that project. The bonus incentive in addition to rebates that cover virtually all of the project cost should incentivize projects within Georgia's DACs.

Track Contractor Delivery in Disadvantaged Communities

During the pre-application phase of the project, the GEFA rebate portal will collect information from the homeowner and/or contractor that will allow the application review team to determine if a household falls within a DAC. This will allow the system to determine if a project is eligible for additional installation incentives. Once deemed a DAC, the project will be able to be tracked and reports will be built out to track the progress of DAC participation.

C. Process to Ensure Applicable Benefits Flow to Disadvantaged Communities:

By using higher incentives for low-income participants and financial incentives for contractors to complete upgrades within DACs, GEFA is hoping to bolster rebate participation in DACs. As detailed under Objective 1. Engage Community and Labor, GEFA plans to focus on education and outreach, particularly in DACs, to increase program awareness and understanding. GEFA will track the rebates issued in DACs and increase the engagement level if the rebate uptake in DACs is not meeting the program goals.

Delivering Direct Benefits to Disadvantaged Communities

To track how effective the program is at delivering direct benefits to low-income households in disadvantaged communities, GEFA will use its rebate portal to produce reports about the rebates issued statewide, and specifically in DACs. These reports will include:

- Number rebates issued within DACs
- Types of upgrades completed in DACs
- Contractors most active in DACs

GEFA will also collect qualitative information about the program and plans to collect feedback from program participants via focus groups and post-project surveys at least twice annually. These surveys will help GEFA understand the benefits that customers are experiencing as a result of their energy efficiency upgrade. These benefits may include annual utility bill savings, improved air quality and reduced exposure to hazards, improved thermal comfort, etc.

Delivering Indirect Benefits to Disadvantaged Communities

GEFA will collect and report metrics of indirect economic benefits expected to accrue to low-income households through a mix of contractor reporting processes, program tracking, sampled data, secondary sources, and community partnerships. These indirect benefits may be tracked by some of the following indicators:

- The number of trained workers from DACs, including those that complete workforce training provided by Georgia's Home Energy Rebate Programs. This may include direct and indirect employment.
- The wages earned by program workers from low-income communities in comparison to local median wages. This will allow GEFA to ascertain the quality of jobs created by the rebate programs.

Summary Table of Commitments

The following chart reflects GEFA's commitments and time-based milestones relevant to Georgia's Home Energy Rebate Programs. These commitments have been addressed in greater detail in the narrative of each corresponding

section. GEFA will use the time-based milestones for each year of the project duration to track and measure progress in delivering program benefits.

Category and Commitment	Year 1	Year 2	Year 3	Year 4	Year 5
Community and Labor Engagement					
Offer a minimum of six feedback sessions with community and/or labor groups each year in various parts of the State (including virtual options for those that cannot attend in person).	# and locations of sessions	# and locations of sessions	# and locations of sessions	# and locations of sessions	# and locations of sessions
Investing in Job Quality and a Skilled Workforce					
Coordinate four certification and/or training opportunities a year throughout Georgia to enable interested contractors to become certified as a BPI Analyst Professional, attain CEUs for existing certification holders, or gain practical knowledge of program and measure requirements.	List of trainings by location	List of trainings by location	List of trainings by location	List of trainings by location	List of trainings by location
Diversity, Equity, Inclusion, and Accessibility					
Confirm and map contractors' service territories to ensure accessibility in all disadvantaged communities, tracking areas in need of increased targeting.	# of contractors in each of the relevant service territories or counties	# of contractors in each of the relevant service territories or counties	# of contractors in each of the relevant service territories or counties	# of contractors in each of the relevant service territories or counties	# of contractors in each of the relevant service territories or counties
Directly engage with four women-owned, veteran-owned, minority-owned businesses per year.	List of businesses engaged	List of businesses engaged	List of businesses engaged	List of businesses engaged	List of businesses engaged
Justice40 Initiative					
Ensure a minimum of 20 percent of completed jobs/upgrades by contractors are in disadvantaged communities.	# of completed jobs/upgrades by contractors in disadvantaged communities	# of completed jobs/upgrades by contractors in disadvantaged communities	# of completed jobs/upgrades by contractors in disadvantaged communities	# of completed jobs/upgrades by contractors in disadvantaged communities	# of completed jobs/upgrades by contractors in disadvantaged communities
Distribute post-project benefit surveys to participants who receive upgrades at least twice annually.	2 rounds of surveys per year	2 rounds of surveys per year	2 rounds of surveys per year	2 rounds of surveys per year	2 rounds of surveys per year