September 18, 2026 *Submitted electronically via: Jotform and PDF*

Maryland Energy Administration
1800 Washington Blvd.
Suite 425, Baltimore, MD 21230

Re: MEA, Residential Energy Equity – Heat Pump Rebate Program

To whom it may concern,

On behalf of Northeast Energy Efficiency Partnerships (NEEP)[1], we are pleased to submit comments in response to Maryland Energy Administration's (MEA) Request for Information regarding the development of the potential Residential Energy Equity - Heat Pump Rebate Program. NEEP is a non-profit whose mission is to accelerate regional collaboration to promote advanced energy efficiency and related solutions in homes, buildings, industry, and communities.

The 2026 Utility RELIEF Act allocated $72.5 million to MEA designed to help low- and moderate-income households adopt efficient heat pumps to lower bills through the Residential Energy Equity (REE) Program. The program also presents an opportunity to support the greenhouse gas reduction targets established by the Climate Solutions Now Act of 2022 (CSNA), which calls for Maryland to reduce statewide greenhouse gas emissions 60% below 2006 levels by 2031 and achieve net-zero emissions by 2045. In addition, increased heat pump adoptions can help advance Building Energy Transition Plan adopted by the Maryland Commission on Climate Change, and Maryland Department of the Environment's Clean Heat goals, including increasing the share of residential HVAC and water heater sales represented by heat pumps to 50% by 2025 and 95% by 2030.

We thank MEA for the opportunity to provide input on this exciting new funding for heat pumps targeting low- and moderate-income customers. We commend MEA for its commitment to energy efficiency, its equitable prioritization of resources for energy justice and low-income communities, and its support for heat pump technology. The following comments are intended to provide technical assistance and resources relating to MEA's expansion of its Residential Energy Equity Program to cover heat pumps through an REE Heat Pump Rebate Program. In addition to these comments, NEEP can offer additional tools, resources, and direct technical assistance on heat pump program design.

Below NEEP responds to the questions outlined by MEA. Specifically, we respond to the following questions from the Request for Information: 1, 2, 3, 4, 5, 6, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, and 22.

Our overarching recommendations are as follows:

- **Establish a heat pump installer network (HPIN)** to ensure participating contractors follow quality installations and proper equipment sizing. This will help maintain consistent workmanship across

[1] These comments are offered by NEEP staff and do not necessarily represent the views of the NEEP Board of Directors, sponsors or partners. NEEP is a 501(c)(3) non-profit organization that does not lobby or litigate.

contractors and build consumer confidence in heat pumps. Contractor and consumer trust are essential to long-term market transformation.

- Provide a streamlined process for whole-home retrofits for LMI customers by coordinating heat pump deployment with existing weatherization and complementary programs. The program should minimize customer burden by coordinating projects and leveraging existing resources and services. MEA can further reduce administrative barriers by managing installations on behalf of customers, helping to increase participation, advance equitable access, and deliver more comfortable, efficient, and affordable homes. Weatherization requirements should be flexible and appropriately tailored to individual homes to avoid unnecessarily delaying or preventing otherwise viable heat pump projects.
- **Lay the groundwork for a statewide, midstream program for market transformation.** A midstream program can help move the supply chain by encouraging distributors to stock heat pumps and giving contractors an instant discount that lowers the upfront cost of air-source heat pumps, bringing ducted systems to cost parity with air conditioners. For heat pump water heaters, such a program could bring the devices to cost parity with electric- or fuel-powered water heaters, removing the upfront cost barrier.

Program Design

1. What key insight, concern, or recommendation would you most like to share with MEA regarding the proposed heat pump rebate program?

For LMI participants, it is best practice to provide a streamlined process that reduces barriers to participation and connects customers with complementary programs and services. MEA should coordinate with existing weatherization programs to encourage and facilitate weatherization before or alongside heat pump deployment. This coordination can help ensure that homes are adequately weatherized and prepared for heat pumps while reducing duplication and administrative burdens for customers. This approach also helps coordinate pre-screening, health and safety upgrades, weatherization, ASHPs, and, in some cases, solar with batteries, into a comprehensive, whole-home retrofit package. This will create a more seamless customer experience and by leveraging existing resources, help to ensure a home is comfortable, has lower operational costs, and contributes non-energy benefits to residents of the home and neighboring community. New York's EmPower+ and Mass Save's turnkey and low-income programs are examples of this type of comprehensive solution. Programs that manage installation on behalf of customers can reduce administrative burdens, improve participation, and support more equitable access to weatherization and electrification. Details on these programs are included below.

- NYSERDA's EmPower+: Provides "end-to-end" services from an initial home energy assessment to Weatherization upgrades to ASHP installations. Participants in the program receive weatherization services at no cost before becoming eligible for funding up to $8,000 for ASHPs. Because the program serves lower income residents, NYSERDA's EmPower+ program prioritizes energy bill affordability. The focus shapes the program's requirements for weatherization and whole-home ASHP sizing, as well as prioritization of homes using oil or propane for heating system upgrades.

- Massachusetts' Mass Save Turnkey Program: Low-and-moderate income customers can qualify for either a fully managed turnkey service that provides pre-Weatherization barrier mitigation, weatherization, and ASHP installation at no cost, or a customer-managed ASHP installation that provides weatherization at no cost and up to $16,000 in incentives. Both income-eligible paths require no-cost weatherization before ASHP installation.

2. How should "low-to-moderate income" be defined for program eligibility purposes?

- **Low-to-moderate income eligibility and definitions should align with similar state program offerings in the energy efficiency sector to avoid confusion for consumers and contractors.** The Department of Housing and Community Development (DHCD) recently filed a proposal[2] to the Public Service Commission for the limited income EmPOWER Maryland program offerings and included an updated income eligibility standard and categorical eligibility approach that could be a strong foundation for MEA's low-to- moderate income definition. DHCD proposed an income threshold set at 250% the Federal Poverty Level or 80% of Area Median Income (AMI), whichever is higher, or whichever threshold is attached to the outside program from which the applicant qualified via categorical eligibility. MEA should evaluate and adjust thresholds in the case of DHCD updates and in alignment with any federal and area income level changes.

3. How can MEA verify household income while minimizing administrative burden for applicants and contractors?

- **For single-family homes, MEA should provide categorical eligibility** via enrollment in existing programs such as but not necessarily limited to: Office of Home Energy Programs (OHEP) Utility Bill Assistance Program, SNAP, Medicaid, DHCD EmPOWER program, DHCD Energy Assistance Program, Weatherization Assistance Program, Supplemental Security Income, MEA Energy Equity Grant, Maryland Fuel Fund, Healthy Homes for Healthy Kids, Baltimore Lead Hazard Control Program.
- **For multi-family homes, NEEP recommends considering categorical eligibility at the property level** when large scale or property-wide replacement is to occur. If an apartment building(s) receives subsidies from county, state, or federal governments or is a tax credit property or project-based Section 8 property or public housing, we encourage categorical approval for the entirety of the property. Additionally, if a property has at least 20-50% of units that qualify as limited income, then the whole property should categorically be accepted. This is in alignment with both DHCD's MEEHA EmPOWER program and the Low-Income Housing Tax Credit program.
- **If a property is unregulated, naturally occurring affordable housing with 5 or more units, we recommend using Census tract American Community Survey data to qualify the property.** If the

[2] Maryland Department of Housing and Community Development. *Proposed EmPOWER Maryland Program Plan for 2027-2029.* Maryland Public Service Commission Case No. 9890 (ML333846). Available for download by searching for Case No. 9890 via https://psc.maryland.gov. Accessed on September 18, 2026.

census tract median household income is below 1500% of AMI (for the county or state, whichever is more inclusive) then the property should be qualified as low-to-moderate income.

4. What quality assurance and consumer protection measures can MEA implement to ensure heat pump systems are properly designed, installed, and commissioned?

- **Promote Contractor Training and Establish a Heat Pump Installer Network (HPIN):** Building and maintaining a highly skilled heat pump and high-performance HVAC workforce is one of the strongest strategies for MEA to help ensure quality projects for consumers and a successful program. Heat pump projects take many shapes and sizes from centralized variable-speed systems to provide efficient, fully-electrified heating services for the home to mini-split systems meant to provide supplemental heating to a particular part of the residence. NEEP's Training Recommendations for Designing & Sizing Air Source Heat Pumps in Cold Climates provides a framework for improving contractor training so that cold-climate ASHPs are properly designed, sized, installed, and operated. The resource is particularly focused on residential air-to-air heat pumps and draws on a review of existing training materials, gap analysis, and input from industry experts. Further, many states in the Northeast have established statewide Heat Pump Installer Networks (HPIN) to create and maintain a pool of qualified contractors to help ensure high-quality projects, and Maryland would benefit from the establishment of such a statewide network. HPINs are an evolution of traditional energy efficiency contractor networks, specifically designed and administered to train and support contractors and heat pump projects. As part of an HPIN, MEA should evaluate and establish project and contractor quality assurance and control resources and standards incorporated into other heat pump programs like: the Contractor Accountability Policy for the HPINs in Massachusetts, Connecticut, and Rhode Island and the Maine Heat Pump Installer Check List. We provide more information and resources on HPINs in our response to Question 6.
- **Leverage a Qualified Heat Pump Products List:** MEA can also help ensure higher quality projects by utilizing a strong qualified product list for heat pump equipment. Maryland has a warmer climate than many of its peer states in the Northern Mid-Atlantic and New England; however, cold-climate performance standards for eligible equipment can provide numerous benefits for Maryland households. Cold-climate heat pumps will provide comfortable, reliable, efficient heating services at 5 degrees Fahrenheit (and many times at colder temperatures), helping to minimize or eliminate any emergency resistance heating and easing grid strain. Further, the variable speed inverter technology in most cold climate heat pumps can host demand-response software and capabilities that could help more homes serve as resources to the Maryland grid. The cold climate performance standards are most important in projects that are fully displacing existing heating systems – installing a non-cold climate heat pump in a whole-home replacement scenario may require significant electric resistance back-up, which could lead to high utility bills and would not help ease grid strain concerns. To help ensure consistency with other national and state programs, we recommend Maryland leverage existing product lists and specifications such as ENERGY STAR Cold Climate, CEE Tier 1 Path A, or NEEP's Cold Climate Air Source Heat Pump Product List and Specification.

5. How can this program best complement existing federal, state, utility, and local energy efficiency and electrification programs?

- **We recommend this program streamline participation for customers and contactors and enable braiding and stacking funds with other programs.** This program should help to fill the gaps where other programs cannot promote fuel switching (such as HEAR rebates). For example, HEAR funds could be used for weatherization upgrades, while this funding provides resources for electrification.
- **We recommend sharing attribution with utility programs where applicable.** MEA should establish a clear framework for sharing attribution with utility programs when program incentives are combined. Layering MEA rebates with utility incentives can reduce customers' upfront costs and help increase participation. To encourage utility engagement and maximize available resources, MEA should consider allowing utilities to claim the full energy savings associated with projects that receive combined incentives, where appropriate. NEEP's Expanding the Energy Savings Pie: Attribution Frameworks to Align IRA Home Energy Rebates and State Programs provides a useful framework for allocating savings and attribution when multiple programs contribute to the same project. MEA could apply a similar approach to establish clear rules for coordinating incentives and assigning savings across state and utility programs.

Contractors

6. How can MEA encourage and support contractor program participation?

- **Establish a statewide Heat Pump Installer Network (HPIN).** A well-trained workforce will lead to successful heat pump adoption and thus a successful program. Many of the most impactful heat pump programs in the Mid-Atlantic and New England have recruited contractor participation through the establishment of a statewide Heat Pump Installer Network (HPIN). HPINs build upon the success of historic energy efficiency contractor networks but establish key criteria for participation like minimum trainings on heat pump sizing, design, selection, and installation, offer exclusive continuing education opportunities, provide transparent and frequent program communications and feedback opportunities, establish rebate exclusivity for participating contractors to provide them an edge in the market, and more. A critical component of an effective HPIN is a user-friendly, web-based "Find a Contractor" tool that makes participating contractors easy for customers to identify while increasing visibility and leads for qualified contractors. MEA can leverage the launch of this new program to establish a statewide HPIN that builds long-term contractor capacity and supports high-quality heat pump adoption. Program designers should refer to NEEP's Heat Pump Installer Network Best Practice Guide for additional guidance and examples from successful HPINs across the region.
- **Discount equipment at the point-of-sale for contractors.** MEA should consider delivering rebates to participating distributors so that eligible equipment can be discounted at the point of sale for contractors. Distributors will still have to temporarily float the costs but tend to have more capital to leverage than contractors. By shifting the cost of the incentive upstream, MEA can reduce cash-flow barriers for smaller contractors and make program participation more accessible.

- **Streamline Rebate Processing and Accelerate Payments.** MEA should design the rebate process to minimize the time contractors and distributors must wait for reimbursement. When a contractor or distributor must pass through a rebate to a customer, they will face a delay in receiving the reimbursement and hold the debt. This can prevent small businesses from participating. MEA can draw on strategies identified in NEEP's High-Performance HVAC Midstream Program Best Practice Guide. One pathway includes ensuring that incentives will be paid out in a certain time span. In Vermont, Efficiency Vermont provides the distributor the incentive reimbursement within 45 days. Establishing a similar service standard could reduce financial risk for participating businesses and encourage broader contractor and distributor participation.

9. What workforce development or contractor recruitment strategies are needed to support successful program implementation?

- **Heat Pump Installer Networks successfully recruit and retain contractor participation.** HPINs often contain several key features, including but not limited to:
    - Incentivizing contractors to attend trainings through stipends or other financial incentives, such as discounts on installation tools.
    - Providing trainings and/or information on how to attend them where contractors go (distributors, Home Depot, Lowes).
    - Providing both online and in-person trainings for contractors to attend.
    - Maintaining transparency and offering communication feedback loops between participating contractors and program administrators.
    - Establishing rebate exclusivity to participating contractors (i.e. consumers may only receive rebates or other financial incentives offered by the program if the project is completed by an HPIN-participating contractor. This approach attracts contractors to participate because they have a captive market and helps the program have confidence that work is being performed to program quality standards.).
    - Hosting a "find a contractor" tool, which provides exposure for contractors to a motivated market segment.
- Please see NEEP's Heat Pump Installer Network Best Practices Guide for more information and examples regarding contractor recruitment and retention strategies for HPINs.

Communications & Equitable Access

11. What post-heat pump installation education or support should be provided to households?

- **NEEP recommends providing a consumer guide for heat pumps** that communicates how heat pumps operate, how to use them effectively, and what to expect in terms of maintenance. Setting appropriate expectations is important because heat pumps operate differently from conventional heating systems. For example, heat pumps warm a room slowly and steadily and run continuously, whereas boilers or furnaces push out extremely hot air in short bursts. Customers should therefore be encouraged to use a "set it and forget it" approach rather than frequently adjusting the thermostat. Additionally, if the

system is ductless there are recommended cleanings twice a year that will be part of typical maintenance. MEA should develop a Maryland-specific version of NEEP's Getting the Most Out of Your Heat Pump, incorporating local program information, customer support resources, and state specific guidance.

12. How can MEA effectively identify and market these rebates to qualifying households?

- **NEEP recommends MEA consider creating a website to notify residents of the new heat pump rebate program** and identify other programs that can help lower energy bills, increase household energy efficiency, and support necessary health and safety upgrades. Establishing a single touch point so that customers can have access to information on available programs no matter where they live in the state can help with marketing and education. One website can also provide links to utility and MEA programs, so that it is easier for customers to find and identify what rebates they are eligible for. Similar states offer such a service, such as Efficiency Vermont's website. The statewide website could also act as a tool for consumers to verify income prior to arranging for a contractor or going to a store.

13. How can this program most effectively serve disadvantaged and overburdened communities?

- **MEA could leverage the MDEnviroScreen** tool to identify, prioritize outreach, and set deployment goals in overburdened and underserved communities.
- **MEA should leverage data and insights from other state programs** to identify, to the extent possible, communities with a concentration of households facing high energy cost burden. These programs could include the OHEP Utility Bill Assistance program, the forthcoming Residential Consumer Assistance Program. Efforts should be made to target households that rely on costly electric resistance or delivered fuels for water heaters or heating systems to better ensure a reduction in household utility costs.
- **MEA should also look to connect with community partners to educate residents about the program and encourage enrollment**. Going to local communities and meeting residents where they frequent, such as churches, community centers, and schools to inform them of the program and the benefits of heat pumps.

14. How can MEA ensure this program is accessible to households for whom English is not the primary language?

- **MEA should partner with bilingual community-based organizations** that serve target communities.
- **MEA should translate all digital and physical communications collateral** for the program to relevant languages.
- **MEA should work to identify and advertise participating contractors and equipment installers that are bi-lingual and/or able to support consumers for whom English is not the primary language.** The MassSave Heat Pump Installer Network contractor search tool serves as a good example for this kind of effort and includes a language filter option and visual markers to clearly identify contractors that can support households for whom English is not the primary language.

15. How can MEA promote heat pump deployment in rural areas where delivered fuels are most prevalent?

- **MEA should partner with HVAC contractors and electric utilities that serve more rural areas** to advertise the new program offerings. A new "find a contractor" search tool should include geographic search options so that users can clearly identify HVAC contractors that serve rural geographies and MEA should set a goal that each county in Maryland is covered by HVAC contractors participating in the HPIN.
- **MEA should consider targeted post card campaigns in communities with a high prevalence of delivered fuels and little or no natural gas.** This will increase the likelihood that homes either have delivered fuels or electric resistance, both of which will save on their energy bills when converting to a heat pump.
- **MEA should also consider partnering with local organizations** in rural areas and communities with a high prevalence of delivered fuels and hold events that discuss the benefits of heat pumps and how residents can apply to participate in the program.

16. How can MEA most effectively connect or refer residents to other state programs and services (DHCD, EmPOWER, etc.) for which they may be eligible?

- **To the extent possible, MEA should coordinate with complementary state and utility programs** so that customers who qualify for one program are automatically connected to, or screened for eligibility for, other relevant incentives. Creating a more seamless pathway across programs can reduce customer effort, increase awareness of incentives, and improve participation in multiple programs.
- **Where automatic coordination is not feasible, MEA should use existing program participation data to conduct targeted follow-up outreach.** Customers who have recently interacted with complementary programs could receive an email, postcard, text message, or phone call highlighting MEA's program and explaining the additional incentives and benefits available through the state.

Project Details

17. Please share any program design feedback related to building types (single-family homes, townhomes or rowhomes, multifamily buildings, rental housing, etc.).

- **MEA should not feel a need to constrain the program by building type due to any technological limitations.** Heat pumps are now offered in the market in a range of configurations that can accommodate different building types. To allow diverse participation in the program, MEA should provide incentives for smaller residential households as well as larger multifamily buildings[3].
- **MEA should not limit participation to homeowners and should identify opportunities to support heat pump retrofits in rental housing.** However, in the event that rental units are upgraded, MEA should work with landlords to ensure that monthly rental costs are not increased as a result of the upgrades.

[3] Recognizing that retrofits to larger multifamily buildings are highly capital intensive, we strongly encourage MEA to pursue complementary funds to stack and braid with REE Heat Pump dollars to ensure that flexible heat pump funds remain available to a large number of Maryland smaller residential households as well.

18. Please share any program design feedback related to project types (natural gas to electric heat pump retrofits, delivered fuels to electric heat pump retrofits, electric resistance to electric heat pump retrofits, like-to-like electric heat pump replacements, dual-fuel systems, etc.).

- **MEA's new heat pump program should target cost-effective installations that will deliver energy and bill savings for household, while also advancing Maryland's decarbonization initiatives.** Moving a household from an electric resistance-based heating system to a heat pump inherently serves as an energy and economic savings scenario thanks to a heat pump's efficiency, which is 2-4 times greater than that of an electric resistance system. Various analyses (including recent analysis from NEEP) demonstrate that, for homes in Maryland, switching from fossil fuel-based heating systems to heat pumps will also save households money. In particular, homes currently heated by delivered fuels (i.e. fuel oil and propane) could save hundreds or thousands of dollars in operational costs annually by switching to an efficient electric heat pump sized to provide all heating services for the home. MEA should feel encouraged and confident to use the new program to target heat pump deployment in homes currently heated by electric resistance, fuel oil, propane, or other delivered fuel systems.
- **MEA should also ensure that a portion of the funds remain available for homes currently heated with gas-fired heating equipment that would likely realize operational cost savings from a heat pump retrofit.** Installing and using a heat pump in a household with an existing gas-fired heating system will save energy and reduce emissions thanks to the high efficiencies of heat pumps. However, local price differences between electricity and gas will often be a primary driver in operational cost savings results. Depending on the individual building, some households with existing gas heating equipment could see cost savings with a simple equipment swap, however, other homes may benefit from envelope upgrades or participation in modern electricity rate design offerings.
- **Further, households with existing gas-fired heating systems may be strong candidates for swapping one-way air conditioning cooling systems with heat pumps that can provide efficient cooling but also offset some or all of the heating services provided by existing gas equipment.** Gas homes should be evaluated for full fuel-switching scenarios and if those pathways do not produce high confidence in operational cost savings, then the households should be evaluated for an "AC-to-HP" swap out with optimized controls for switchover temperatures that would deliver cost savings. The incentive level for these "AC-to-HP" swap out projects should be set lower than whole-home heat pump projects and be optimized to cover the incremental cost associated with choosing a heat pump over an efficient one-way air conditioner for the project. PSE&G's heat pump program offerings in New Jersey offer a good example for MEA to evaluate regarding how to right-size incentive levels for "AC-to-HP" projects that opt to retain a fossil fuel back-up system that is already in place in the household. Finally, qualifying gas homes that receive heat pumps from the new program should be educated on the opportunity to enroll in additional utility bill support programs like the Residential Consumer Assistance Program.

19. Please share any program design feedback related to heat pump technologies (air-source heat pumps, ductless mini-split heat pumps, ground-source heat pumps, etc.).

- **MEA should be sure to provide incentives for technology that is most appropriate for the homes in Maryland, such as ducted and ductless heat pumps.** Air-to-Water and ground-source technologies can also be included but are a much higher upfront costs, so consideration should be given as to whether these rebates should be higher or if there are other programs that MEA can coordinate with or stack funding with to help lower the higher upfront cost point.

20. If possible, should MEA offer rebates for heat pump technologies other than heat pumps for space heating and cooling (heat pump water heaters and clothes dryers, etc.)?

- **MEA should also consider heat pump water heaters to help fully electrify a home.** These rebates can be offered directly to distributors or contractors and make the cost of a heat pump water heater comparable to the cost of an electric resistance water heater.
    - Efficiency Maine Trust has a robust heat pump water heater program that has advanced adoption in the state significantly. The state currently offers a $1,150 standard rebate for water heaters. This discount is available for at both distributors and at big box retailers for individuals that install units themselves.
    - Energy Trust of Oregon has a similar program, they offer over $1,00 midstream rebates to contractors at distributors and $1,000 instant discount for DIY/retailer for customers that go to big box stores.
- This type of rebate will require income verification for residents also, if only available to moderate-income residents. Efficiency Maine Trust provides In-Store Instant Discounts at retail stores so residents can log in and receive the rebate when they go to purchase the equipment. Focus on Energy in Wisconsin currently allows residents to verify their income level online prior to contacting a contractor.

21. If possible, what supporting measures would be most beneficial to include as eligible costs under this program (electric panel upgrades, wiring, insulation and air sealing, energy audits, Manual J and other assessments, etc.)?

- **Generally, MEA should maximize the use of more restricted funding via appropriate stacking and braiding of resources to deliver additional beneficial upgrades.** With that in mind, it may be appropriate to reserve some funds in the new program for electrification-enabling upgrades like electrical or envelope upgrades, especially in scenarios where homes are not eligible for other programs or cannot allow for extended project timelines due to an emergency HVAC replacement scenario.

22. Should energy audits and weatherization be required before heat pump retrofit projects?

- **Weatherization should only be required if/when an energy audit identifies building-envelope needs that could significantly impact a heat pump's performance and related energy costs.** In those cases, MEA may consider a required minimum level of weatherization appropriate to the home's needs, while allowing flexibility based on the results of the assessment. For low-income households in particular, MEA should prioritize approaches that make weatherization easy to access and minimize customer costs and administrative burdens. Low-income residents tend to live in older, leakier homes where weatherization delivers the deepest bill savings and comfort improvements. Mass Save's Turnkey

program and New York's EmPower+ offer useful models for this approach. Both programs bundle pre-screening, health and safety upgrades, weatherization, and the heat pump installation into a single managed process, so the customer isn't left coordinating separate contractors and separate paperwork. If the program lacks the infrastructure for a fully managed direct-install offering, it should, at a minimum, streamline eligibility, funding, and paperwork across the weatherization and ASHP tracks, and actively encourage coordination between weatherization and heat pump contractors, so customers face as few extra steps as possible.

- **Another option is to establish a clear weatherization standard that identifies when additional work is needed before a heat pump is installed.** For example, Mass Save considers a home to have "sufficient weatherization" if it was built after 2000, requires less than $1,000 in recommended weatherization improvements, or has been weatherized since 2013. MEA could consider a similar framework tailored to Maryland's housing stock and existing weatherization resources.
- More information on this topic can be found in NEEP's report, To Weatherize or Not to Weatherize: Should Residential Energy Efficiency Programs Prioritize Weatherization with Whole-Home Heat Pump Rebates?

Conclusion

We appreciate the opportunity to provide feedback as MEA designs and implements this program. In addition to these comments, NEEP has additional tools and resources available as well as direct technical assistance on heat pump program design.

Sincerely,

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