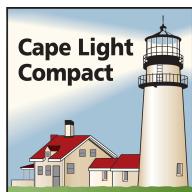




Mass Save® Income-Eligible Multi-Family Retrofits

Program Guide

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Summary

The Mass Save® Income-Eligible Multi-Family Retrofit Program (IEMF, formerly known as LIMF) is a no-cost or incentivized energy efficiency program sponsored by the Massachusetts Energy Efficiency Program Administrators (PAs) – electric and gas investor-owned utilities and Cape Light Compact – to eligible owners of affordable multi-family housing. IEMF is administered collaboratively by the PAs and the Low-Income Energy Affordability Network (LEAN). The program serves to benefit residents and owners of affordable multi-family housing by providing no-cost or incentivized energy efficiency improvements through a comprehensive approach to common areas and resident units. The program is open to all types of ownership entities, including non-profits, for-profits and public housing authorities; eligible sites are those with buildings having five or more units where at least 50% of the units are occupied by households at or below 60% of Area Median Income. Clients must additionally be customers of an investor-owned utility for electricity or natural gas.

Using a whole building approach, IEMF provides Clients with electrical energy efficiency measures and building shell and heating system upgrades, as appropriate. IEMF contains three pathways for building upgrades: Direct Install, Client-Managed Incentive, and Deep Energy Retrofit (DER). See Appendix A, Definitions, for a description of each. This guide primarily addresses the Direct Install and Client-Managed Incentive pathways; for information on DER, please see Appendix C. Energy efficiency measures must meet program standards for each pathway; for example, the Direct Install and Client-Managed Incentive pathways require that measures be cost-effective to be approved. Measures may include a mix of prescriptive upgrades that are installed in almost all cases and custom installations that are designed and evaluated on a project-by-project basis. Potential upgrades include space heating systems, heat pumps, variable frequency drives, hot water systems, air sealing and insulation of building envelopes, interior and exterior lighting retrofits, refrigerators/freezers, energy saving power strips, low-flow showerheads, faucet aerators, and programmable thermostats.

Daily implementation of IEMF is managed by Lead Agencies that are coordinated through LEAN. Lead Agencies are community-based agencies, primarily Community Action Programs (CAPs), that offer low-income energy assistance throughout Massachusetts. LEAN manages the intake and review of applications, refers approved applications to the Lead Agencies, and provides technical assistance to the Lead Agencies. The Lead Agencies manage the audits, installations, inspections, and payments.

To be approved, Clients complete an online information form at leanmultifamily.org, submit documentation of tenant income eligibility, and provide gas and electric account information. Once approved, Clients in the Direct Install pathway receive one or both of the following services, depending on eligibility:

- (1) Clients that are customers of an electric PA receive an Electric/Appliance Audit, which is a standard service of all the electric PAs. The Electric/Appliance Audit is done in two phases. The first consists of a visit from the Lead Agency or its Vendor to a) provide immediate prescriptive measures, including energy saving light bulbs and power strips; and b) inventory inefficient equipment that may be eligible for replacement. Phase Two is a follow-up visit to install any cost-effective equipment identified during the first phase, which may include interior and exterior lighting fixtures, occupancy sensors, refrigerators/freezers, and window AC units.
- (2) Approved Clients with gas heat from a gas PA or electric heat from an electric PA receive a walk-through evaluation by an Energy Auditor of all of the building's common areas including utility rooms and a sampling of tenant units to capture the building's overall condition and performance. This service is called

a Building Assessment. The purpose is to identify all opportunities for efficiency measures, such as insulation, air sealing, weatherstripping, and attic ventilation; the need for space or water heating system upgrades; and any other potential upgrades the Energy Auditor observes. If the Energy Auditor identifies the opportunity to replace any part of the HVAC system or any other upgrade that requires customization, a new system will be scoped during a follow-up visit by the Energy Auditor or a technical specialist.

Recommended energy efficiency measures in the Building Assessment are evaluated for cost-effectiveness, and approved measures are put out to bid or assigned to a pre-approved Contractor by the Lead Agency. Once a Contractor is selected and the scope of work finalized, the Client and the PA or Lead Agency will sign agreements to proceed. All installations are inspected for quality control, and any issues that arise are resolved by the Lead Agency or the Client, depending on the pathway. Payment is made typically to the Contractor, or in limited cases, to the Client.

Properties heated via delivered fuel(e.g. oil, propane) AND have electricity provided by an electric PA will be served via the electric PA/corresponding Lead Agency.

Clients in the Client-Managed Incentive or DER Pathways handle the assessment, scoping, and installations on their own, but may still receive the Electric/Appliance Audit depending on their scope of work.

Steps in the Program

IEMF has a rolling application and approval process with the following five steps:

1. Application Submittal through leanmultifamily.org including affordability documentation and utility account information
2. Referral to Lead Agency

Once approved, Projects served by an ***electric PA*** proceed to the following:

3. Review for Prior Service
4. Assignment to Energy Auditor/Vendor
5. Electric/Appliance Audit, Phase 1:Installation of Prescriptive Measures (if pass #3)
6. Electric/Appliance Audit, Phase 2: Installation of Approved Custom Electric Measures

Above Projects ***with electric heat*** and approved Projects ***with gas heat from a gas PA*** proceed to the following:

7. Assignment to an Energy Auditor
8. Building Assessment & (possible) Follow-Up with Technical Specialist
9. Evaluation of Cost-Effectiveness of Recommended Measures
10. Contractor Selection (if pass #9)
11. Authorization to Proceed (if pass #10)
12. Installation & Inspection
13. Payment by Lead Agency to Contractor

Some variations do occur between Lead Agencies in steps 3-13, and owners or managers of multiple sites served by different utilities may notice slight differences across Projects.

Any potential Client unsure about what a building qualifies for can refer to the table on page 6: *Eligibility for IEMF Services by Heating Fuel & Utility Provider*.

Program Details

Program Administration

The IEMF Program is funded and overseen by the PAs as established in the Green Communities Act of 2008. As a low-income energy efficiency program, the IEMF Program is managed and operated collaboratively by the Low-Income Energy Affordability Network and the PAs. This arrangement means that daily operations of the program are handled by LEAN and its member Lead Agencies while program standards, policies, and evaluations are developed jointly by LEAN and the PAs. One exception is Cape Light Compact, which shares responsibility for implementation of the program with its Lead Agency. Figure A shows the matrix of PAs, LEAN and their Lead Agencies.

LEAN maintains the central application portal, reviews and approves applications, refers approved applications to the appropriate Lead Agency, provides technical assistance to the Lead Agencies, coordinates program reporting and evaluation, and chairs the IEMF Advisory Committee. The Lead Agencies provide Clients with building audits and installation of measures.

Initial design of the program was developed by the IEMF Advisory Committee (formerly known as the LIMF Advisory Committee), which consists of the PAs, partner agencies, LEAN representatives, multi-family building owners, the Executive Office of Housing & Livable Communities (EOHLC), New Ecology, Inc., LISC, and other affordable housing stakeholders. The Committee continues to act as a forum for policy development, advocacy and overall program evaluation. The Committee meets as needed and is not involved in the day-to-day operation of the program.

Figure A: IEMF Implementation Team

See Appendix B for contact information.

Lead Agency	
LEAN	Action for Boston Community Development (ABCD)
Program Administrator	
Berkshire Gas	Community Action Pioneer Valley (CAPV)
Blackstone Gas	<i>No IEMF Program at this time</i>
Cape Light Compact (CLC)	Housing Assistance Corp. (HAC)
Eversource Gas of Massachusetts (Formerly Columbia Gas)	ABCD
Liberty Utilities	Citizens for Citizens (CFC)
National Grid Electric & Gas	Action, Inc.
Eversource Electric & Gas	ABCD
Utilil	Montachusett Opportunity Council (MOC)

Program Standards

The IEMF Program follows cost-effectiveness standards contained in the *Massachusetts Technical Resource Manual (TRM)*, which are shared across all Mass Save® programs. The *Technical Resource Manual* contains data and algorithms that form the basis for how measure savings are calculated. Energy Auditors are BPI certified and have product training from companies serving as manufacturers' representatives. Standards for energy efficiency

measures, including products and techniques, come from accepted practices of the Department of Energy, the single-family Weatherization Assistance Program, studies and tests by the PAs and the Energy Efficiency Advisory Council, and recommendations from the Low-Income Best Practices Working Group. The Low-Income Best Practices Working Group is similar in composition to the IEMF Advisory Committee and meets periodically to share information on new or improved energy efficiency techniques, measures, and products.

Project Eligibility

Sites must meet the following eligibility criteria:

- At least 50% of the development households have income at or below 60% of the Area Median Income; AND
- Site contains one or more multi-family buildings with 5 or more units; AND
- Site is served by one of the electric Program Administrators and/or has natural gas as its primary heating fuel (building heat) and is served by one of the gas Program Administrators.

Within the IEMF Program, gas and electric efficiency services may be delivered separately, and a given building may qualify for one but not the other, depending on what type of heat the building has and whether it is served by investor-owned utilities. The table below shows the specific services available based on these factors.

Eligibility for IEMF Services Based on Heating Fuel & Utility Provider			
Heating Fuel & Provider Type	Electricity Provider Type	Appliance Audit & Electrical Upgrades	Building Assessment & Shell/Heating System Measures
Gas heat from gas PA	PA	Y	Y
	Municipal	N	Y
Gas heat from municipal gas department	Municipal	N	N
Electric heat from electric PA	PA	Y	Y
Electric heat from municipal electric plant	Municipal	N	N
Oil or propane heat	PA	Y	Y
	Municipal	N	N

Application Process

Step 1 – Application Form

The first step in the application process is to submit the online information form at leanmultifamily.org.

Step 2 – Energy Usage

The second step is provide a recent bill for all utility accounts serving the buildings included in the application (gas & electric). If there are tenant-paid utilities, submit bills for the common areas and a full list of resident addresses.

Step 3 – Affordability Documentation

1. The final step in the application process is to submit documentation of affordability. Documentation may include a) a deed restriction with specific wording that at least 50% of the units are reserved for households earning no more than 60% AMI, b) a recent income survey, c) a letter from the Executive Director or equivalent stating that the property is used as a shelter, or d) other form approved case-by case. For further details, please see our FAQ page under the question “What proof of eligibility is required?”: <https://leannmultifamily.org/faq/>. **For-Profit Owners:** In order to ensure that the benefits offered through IEMF accrue to low-income residents over the long-term, IEMF requires that for-profit owners sign a 1-year, 5-year or 10-year (depending on property size) affordability agreement with LEAN, if there is no documentation of current affordability restrictions and/or the current affordability restrictions do not meet our income and length of term requirements.

Review & Approval

IEMF is a rolling, non-competitive program. Applications are reviewed for completeness of information and eligibility. If an application meets the eligibility requirement, it will be approved and referred to the appropriate Lead Agency.

Energy Efficiency Work for Approved Projects

Once approved, applications are referred to the appropriate Lead Agency for energy audits and potential installation of energy efficiency measures. Depending on the utility service to the building, a site will receive: 1) an Electric/Appliance Audit for standard electrical upgrades and/or 2) a Comprehensive Building Assessment for a mix of cost-effective building shell, heating, and/or ventilation upgrades. The audits are usually provided separately but may be rolled into one visit. The Lead Agency/Agencies (or their Vendor) will contact the Client to arrange the audits.

Electric/Appliance Audits

Electric/Appliance Audits are a standard service provided by the electric PAs through the Lead Agencies or pre-selected Vendors. All Clients served by an investor-owned electric utility are referred to their electric PA for an Electric/Appliance Audit. The purpose of Electric/Appliance Audits is to identify opportunities to upgrade specific equipment deemed inefficient, including refrigerators/freezers, window AC units, and lighting. The electric PAs have found that replacing inefficient refrigerators and lighting equipment is a highly cost-effective way to help ratepayers save on their electric bills.

After referral for an Electric/Appliance Audit, the site then goes to the Lead Agency/Vendor, who reviews it to determine if the site has already received this type of audit. This step is necessary since Electric/Appliance Audits have been available to Clients for several years separately from IEMF. Typically, if the site has been served within the last five years, it will not be served again unless there is a specific reason to do so. The Lead Agency or Vendor will notify Clients what they qualify for. For sites that pass the screening, the Vendor contacts the Client to schedule the audit. Installation of efficient light bulbs and energy-saving power strips usually occurs the same day as the audit (Phase 1). Installation of new fixtures, refrigerators/freezers, and window AC units that pass the

cost-effectiveness test typically occurs shortly afterward by the same Vendor or another designated Vendor, once the equipment is procured (Phase 2).

Building Assessments for Heating and Shell Work

Clients with natural gas heat or electric heat from a PA or with oil heat or propane heat and served by an electric PA can obtain heating, hot water, and insulation upgrades through the Direct Install option or the Client-Managed Incentive option. In Direct Install, Building Assessments are conducted to evaluate the building enclosure, heating systems, domestic hot water equipment, ventilation systems, and cooling. In cases where a Client has already conducted a similar assessment, commissioning study, or engineering study, the Lead Agency will request a copy of those materials and may choose to forgo the IEMF Assessment.

Building Assessments are conducted by staff auditors with BPI certification and specialized manufacturer training. Energy Auditors identify the opportunity and need for standard building shell measures, such as air sealing and insulation, and screen for site-specific measures, such as a boiler replacement or heat pump retrofit. Screening includes the age, condition, and type of equipment. If heating system or ventilation system measures are warranted, the Auditor may bring in a technical specialist to scope a new system.

In the Client-Managed Incentive pathway, the Client conducts the Building Assessment and develops the scope of work and provides copies to the Lead Agency. The Lead Agency may conduct a walk-through assessment to confirm details in the Client's audit.

Client Participation

Energy Auditors will make every effort to conduct the Assessment in the company of the Client or Client's representative. This will allow the Auditor to determine the expertise of the staff and orient them to the specific efficiency characteristics of their building. It will also allow a discussion of the most prominent opportunities for savings and the factors that will govern the evaluation of measures. If at all possible, the Auditor will brief the Client at the end of the Assessment on the outcome. If a return visit with a technical expert is necessary, the Client will again be included in the walk-through and will be briefed on the outcome.

Energy Efficiency Measures

The program allows for a range of energy efficiency measures to be considered for installation. A few measures fall into the category of "prescriptive measures," meaning they have been determined to be cost-effective in the vast majority of building situations and are pre-approved for installation. The remaining possible measures are identified based on a building's unique conditions and are evaluated for cost-effectiveness on a case-by-case basis. The following is a list of measures allowed for consideration.

Allowable Electric Measures

Insulation: attic, basement, wall, duct

Attic ventilation

Air sealing

Programmable thermostats

DHW measures: tank & pipe insulation, low-flow showerheads, faucet aerators, temp set at 125°

Heat pump water heater

Ducted air source heat pumps

Ductless mini-split air source heat pumps

Window AC replacement

Refrigerators & freezers

LED light bulbs
Interior & exterior light fixture replacement, including controls, photocells, occupancy sensors
Torchieres
Energy-saving power strips

Allowable Gas Measures

Insulation: attics, walls, basements, ducts
Attic ventilation
Air sealing
Programmable thermostats
DHW measures: tank & pipe insulation, low-flow showerheads, faucet aerators, temp set at 125°
DHW system replacement
Duct sealing
Heating system replacement
Pipe insulation
Outdoor reset control
Heat recovery ventilators

Contractor Selection for Building Shell & Heating System Measures

In the Direct Install option, Lead Agencies manage the selection of Contractors; according to each PA's requirements, Lead Agencies will either issue an invitation to bid and take the lowest bidder or will select a pre-qualified Contractor. LEAN provides technical assistance to Lead Agencies in identifying, selecting, and overseeing Contractors, as needed. The selected Contractor will conduct a walk-through of the site prior to the scope of work being finalized. The Lead Agency will enter into a contract with the Contractor for each Project (note that there may be more than one Project at a given site and more than one Contractor).

In the Client-Managed Incentive option, the Client procures the Contractor and manages the scope of work and installation.

Authorizations to Proceed

Once the Lead Agency has approved the Project, the Client and either the PA or the Lead Agency, per the PA's requirements, will sign a standard Notice to Proceed or contract. Different PAs have different documents that must be signed, and in some cases more than one document may be required. Clients with Client-Managed Incentive Projects will also be required to sign a Terms & Conditions document outlining responsibilities and expectations.

Inspections

In all three pathways, the Lead Agency will conduct in-process and/or post-installation inspections of the energy efficiency measures. In Direct Install Projects, any issues that are identified will be resolved by the Lead Agency in concert with the Contractor, if needed. In Client-Managed and DER Projects, the Client is responsible for resolving issues found during inspection. Maintenance staff or another Client representative should attend the final inspection.

Appendix A: Definitions

Electric/Appliance Audit: The standard installation of prescriptive upgrades to refrigerators/freezers, window AC units, LED light bulbs, lighting and other water and power-saving devices done by the electric Program Administrators (see below). These audits have different names through different PAs, e.g., AMP Audits, ESP Audits, NCAP Audits.

Area Median Income (AMI): Defined by HUD for each region of the state at various household sizes. AMI is commonly used to establish affordability restrictions.

(Energy) Auditor: Person or company selected by the program to conduct Building Assessments or Electric/Appliance Audits for the purpose of evaluating the opportunity for energy efficiency upgrades. See also Vendor.

Benefit Cost Ratio (BCR): The term used to describe the ratio between savings and costs that determines which upgrades can be installed through IEMF. BCR is calculated through standard algorithms established in the *Massachusetts Technical Resource Manual (TRM)* and is expressed as a number from 0 to infinity. The program will install only measures that have a BCR of 1.0 or higher. See also *Cost-Effective*.

BTU: British Thermal Unit is used to measure the energy content of fuel. 1 BTU = 1/100,000 therms.

Building: A building that qualifies for the program. It must contain five or more residential dwelling units with at least 50% of the households meeting the 60% AMI threshold.

Building Assessment: The walk-through evaluation of a building's equipment and conditions to identify opportunity for building envelope measures, identify need for upgrade to heating systems, and note any health or safety risks.

Client: Public Housing Authority, non-profit, or for-profit owner or representative of a multi-family property participating in the IEMF Program.

Client-Managed Incentive Pathway: The standard incentive pathway in which Clients choose their own scope of work and select and manage their contractor. The Lead Agency contributes an incentive for the measures deemed to be cost-effective.

Community Action Program (CAP) Agency: A non-profit entity and member of the Low-Income Energy Affordability Network that serves a particular region of the state with energy assistance programs, including the IEMF Program.

Contractor: Person or company providing installation services for building shell and HVAC work. Distinct from *Vendor* (see below).

Cost-Effective: As required by the Green Communities Act, all energy efficiency measures provided under the IEMF and other Mass Save® programs must be cost-effective to ensure that the value of the measures is greater than their costs. A Benefit Cost Ratio (BCR) is calculated to compare savings to costs. Measures with a BCR of 1.0 or higher are considered cost-effective.

Deep Energy Retrofit Pathway: Custom pathway in which Clients have a scope of work that will result in Energy Use Intensity savings of at least 40%. The Lead Agency provides a partial incentive based on the savings.

Direct Install (or Installation) Pathway: The standard pathway in which Clients receive prescriptive or cost-effective custom measures directly through the Lead Agency's vendor at no cost. The Lead Agency handles all contracting, oversight, and inspections.

Eligible Properties: Sites served by one or more of the Massachusetts *Energy Efficiency Program Administrators* with one or more buildings meeting the definitions of *Low-Income* and *Multi-Family* (see below). Eligible properties can be owned by a non-profit, for-profit, or government entity. Eligible properties include family housing, elderly housing, Single Room Occupancy (SRO) units, and shelters, among others. The program serves the residential buildings at eligible properties only. Community (non-residential) and administrative buildings are not eligible for services unless they serve the residents only and contain no commercial use.

Heating Degree Day (HDD): A unit of measurement of how much and for how long the outside air temperature during the heating season is below a base temperature of 65 degrees Fahrenheit. HDD is used to account for weather changes in order to compare heating fuel consumption from one year to the next.

Lead Agency: The CAP agency or other non-profit, community-based organization responsible for implementation of the IEMF Program. Part of the Low-Income Energy Affordability Network.

Low-Income: For purposes of this program, low-income means at least 50% of the units in a residential building are occupied by households earning at or below 60% of AMI.

Low-Income Energy Affordability Network (LEAN): The network of CAP agencies, other community-based organizations, government agencies and other stakeholders that coordinates delivery of fuel assistance and energy efficiency services to low-income residents in Massachusetts.

Low-Income Multi-Family Advisory Committee: The committee that assists with policy development and advocacy for the program. The Committee includes Program Administrators (see below), LEAN agency staff, technical advisors, and representatives of multi-family affordable housing.

Mass Save: The brand name of all the energy efficiency programs offered by the Energy Efficiency Program Administrators (i.e., investor-owned gas and electric utilities and Cape Light Compact) in Massachusetts:
<http://masssave.com>.

Measure: Any heating, building envelope, ventilation, appliance, lighting or other energy efficiency upgrade identified and/or funded through the program. Allowable measures are listed on page 10.

Multi-Family: A building having at least five residential units. Buildings with fewer than 5 units are considered to be single-family and are served by the Mass Save® residential (1 to 4 unit) programs. However, there are also multifamily scattered sites, which include groups of 1-4 unit buildings.

Notice to Proceed: Signed installation agreement between the Lead Agency or PA and the Client regarding permission to install upgrades (Direct Install) or to proceed with the work covered by the incentive (Client-Managed

Incentive or Deep Energy Retrofit). Clients receiving incentives will additionally sign a Terms & Conditions agreement covering invoicing, payment, and other terms.

(Energy Efficiency) Program Administrators (PAs): The electric and gas investor-owned utilities and municipal aggregators that administer IEMF and other energy efficiency programs in the state. The IEMF PAs are Berkshire Gas, Cape Light Compact, Columbia Gas, Liberty Utilities, National Grid, Eversource, and Unitil.

Project: A discrete scope of work funded by LEAN occurring in one or more buildings. An Eligible Property (see also Site) may have more than one Project occurring at the same time, i.e. a mix of Direct Install and Client-Managed Incentive or different Projects in different buildings.

Site: See Eligible Properties. A site may have more than one Project occurring at the same time.

Therm: A unit of measurement of the energy content in fuels, equals 100,000 BTU.

Vendor: A person or company used for Energy Audits or installations. Vendors are pre-selected by the Lead Agencies.

Appendix B: Contact Information

	Lead Agency	Contact
LEAN	Action for Boston Community Development (ABCD)	James Collins 617-348-6430 James.collins@bostonabcd.org
Program Administrator		
Berkshire Gas	Community Action Pioneer Valley (CAPV)	Peter Wingate 413-774-2310 pwingate@communityaction.us
Cape Light Compact (CLC)	Housing Assistance Corp. (HAC)	Meredith Miller, CLC 508-744-1277 mmiller@capelightcompact.org Joshua Trott, HAC jtrott@haconcapecod.org
Eversource Gas of MA (formerly Columbia Gas)	ABCD	James Collins see above
Liberty Utilities	Citizens for Citizens (CFC)	Madeleine Cormier 508-675-2157 mcormier@cfcinc.org
National Grid Electric & Gas	Action, Inc.	Brian Beote 978-283-2131 bbeote@actioninc.org
Eversource Electric & Gas	ABCD	James Collins see above
Unitil	Montachusett Opportunity Council (MOC)	Karen Hulette 978-342-7025 x 310 khulette@mocinc.org

IEMF website: leanmultifamily.org

Mass Save: masssave.com

Appendix C: Deep Energy Retrofit Pathway

The DER pathway was started in 2023 as a way to serve Clients with a high level of retrofit, such as building decarbonization, at their Eligible Properties. DER Projects must meet a 40% reduction in site EUI compared to existing building conditions. The incentive is \$350 per million BTU (MMBTU) savings, as calculated through a whole building energy model completed by LEAN.

Highlights:

- Projects typically include higher-than standard weatherization and other energy efficiency measures to reach the 40% reduction target.
- Projects typically include electrification of space heating and water heating but are not required to do so.
- Renewable electric systems do not count toward 40% savings.
- Projects are client-managed, and clients must do the upfront work of designing and selecting the scope.
- The incentive is paid out at the end of installation, after LEAN inspection.
- The pathway includes commissioning (Cx) 6 months after construction is completed, paid for by the PAs.

What is the process?

The DER process is distinct from the standard LEAN program, however, both use the same application form. Because most of the work is client-managed, including the design, scoping, and contractor selection, LEAN's role is to validate the projected savings and then conduct an inspection, issue the incentive payment, and oversee the additional commissioning. LEAN has centralized DER review and coordination at ABCD.

Key steps:

- Client submits the LEAN application: leanmultifamily.org
- Client meets with LEAN to share plans for the project and learn about the pathway ("Stage 1")
- Client completes the retrofit design and submits specifications to LEAN ("Stage 2")
- LEAN reviews the project materials and confirms the energy savings and incentive amount ("Stage 3")
- LEAN and Client sign agreement and Client proceeds with construction
- Client submits an invoice when installation is complete and LEAN completes the inspection
- LEAN pays the incentive
- 6 months after completion, LEAN conducts commissioning paid for by the PAs

LEAN DER webpage: <https://leanmultifamily.org/der/>