



Opinion **Dynamics**

EM&V/IRA Attribution

*Missouri Public Service
Commission Virtual Workshop*

May 9, 2023

Implications of IRA Funding on EM&V and Attribution

- Home Energy Rebates
 - Too early to tell!
 - Implications on EM&V will depend on the details of DOE guidance and Division of Energy application of guidance
 - Need for continuing discussions between regulators, utilities, and evaluators as details become available
- Residential Tax Credits
 - Relevant for 2023 – but only for small subset of measures/programs
 - Considerations:
 1. How to capture tax credits in attribution methodologies?
 2. What are potential impacts of IRA tax credits on attribution?

How to capture tax credits in attribution methodologies?

- Tax credits are not new
- Our current residential free ridership methodology focuses on program factors
- Methodology does not attempt to “divide” attribution between program and specific other factors (e.g., tax credits)
 - *Tax credits are already accounted for in current methods, but implicitly*
 - *Methods could be adapted to more explicitly investigate role of tax credits*
 - *Policy decision of whether this is needed/valuable*

What are potential impacts of IRA tax credits on attribution?

- Tax credits are not new
- Impact of IRA tax credits might still differ from prior tax credits:
 - Might attract different segments of the population
 - Higher limits might affect importance in the decision-making process
 - Program design/implementation changes, if any
- Would only affect a small portion of the portfolio
 - *Overall impact on attribution is difficult to predict*
 - *Any impact would be limited to a small number of measures and programs*

Recap

- Ongoing discussions between regulators, utilities, and evaluators are needed as details about IRA rebates become available
- Free ridership methodologies can account for tax credits (and non-utility rebates) – and already do, but not explicitly
- Impact of IRA tax credits on attribution may not be that significant



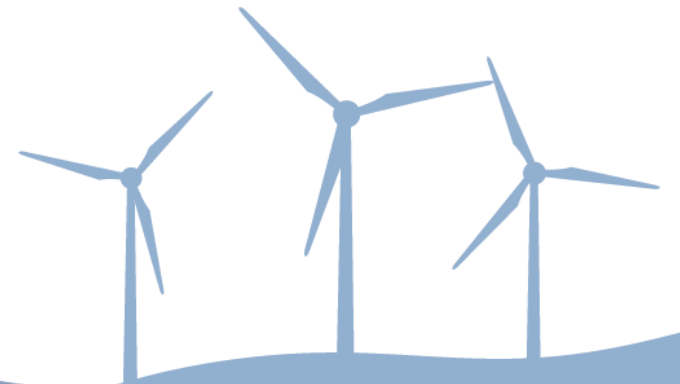
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