

Rory Christian
Chair, Public Service Commission and CEO, Department of Public Service
Empire State Plaza
Agency Building 3

May 16th, 2024

Dear Chair Christian:

We, the undersigned 157 organizations representing tens of thousands of New Yorkers, commend the Public Service Commission and Department of Public Service staff for your efforts to correct the many challenges facing the state's signature energy efficiency and building electrification initiative, New Efficiency: New York (NENY). We appreciate this opportunity to offer our comments.

Energy efficiency should be the cornerstone of the state's approach to its energy policy. Moreover, New York needs a holistic approach to investing in our buildings and our communities. Given that buildings are our state's largest source of greenhouse gas emissions and a major source of air pollution, NENY is foundational to equitable achievement of the greenhouse gas and pollution emissions mandates central to the state's Climate Act.

Our homes are where we shelter from the elements, where we gather with family and friends, and where we tuck our children into bed at night. All New Yorkers deserve to live in safe, healthy, buildings that provide comfortable shelter. Yet keeping our homes safe and comfortable is beyond the means of a large percentage of New York households.

If reimagined and thoughtfully implemented, the five billion dollar NENY program offers our greatest opportunity to lower the bills of energy insecure households, improve health, safety and resiliency, and address long standing equity issues in our housing and energy sectors. Existing programs are seemingly designed so that only the easiest to retrofit homes get assistance, and millions of more challenging buildings and their residents are left behind, thereby deepening existing inequities.

The July 20, 2023, Order Directing Energy Efficiency and Building Electrification Proposals introducing the Strategic Framework was an urgently needed course correction to make better use of ratepayer money. However, our organizations are deeply concerned about the potential for continued underperformance of these programs in low-and-moderate income (LMI) households and disadvantaged communities (DACs), the lack of resources needed to meet the scale of decarbonization and electrification necessary to achieve the goals of the CLCPA, and the lack of transparency and accountability for how program administrators will engage participants and deliver effective programs to LMI households and DACs.

We urge any subsequent actions and implementation orders from the Commission to center the following priorities. A successful NENY program should accomplish the following:

- **Invest In Our Communities** *by allocating 50% of the overall NENY budget to LMI households and DAC programs, prioritizing structural barrier removal and building shell improvements.*
 - Expand 1-4 family and multifamily programs to cover more improvements, including pre-weatherization and heat pumps, and right-size grants so they reflect today's costs.
 - Use "LMI and DAC first" neighborhood scale approaches that reduce system costs and improve affordability by leveraging electrification capacity maps directed in the July 2023 Order to target strategic electrification and efficiency investments in LMI communities and DACs.
 - Double the job training targets to meet the needs for efficiency in DACs through local hiring.
 - Create a plan to use funds from the Inflation Reduction Act, New York Cap-and-Invest, and other state resources in coordination with NENY funds to dramatically scale the number of units retrofitted, the depth of interventions, and the amount of barrier reduction to energy efficiency and electrification in LMI and DACs.
- **Make the Programs Easy to Use** *and meet people where they are.*
 - Make applications simple, standardize incentives, and speed up approval so that when building owners decide to or need to act, they can address their needs in a timely manner (e.g., address emergency situations, substantial renovations)
 - Create an "all-roads-lead-to platform" for accessing program information and applications that provides a painless experience for customers and contractors
 - Collaboratively design and field-test programs with the communities that will use them so that they are intuitive, accessible, and user friendly.
- **Value Our Lives, Our Health, Our Comfort, Our Safety** *by incorporating health and other benefits into the calculations that inform investment decisions.*
 - Quantify the benefits of removing lead, mold, asbestos, and other hazards as part of energy efficiency retrofits.
 - Quantify the health impacts of improvements to indoor air quality that result from energy efficiency retrofits and electrification.
 - Quantify the health improvements from access to cooling, ventilation, and air filtration.

NENY was originally developed before New York's Climate Law was enacted. With new mandates and new Commissioners, you have the opportunity and the responsibility to reimagine NENY as not merely a program to be administered, but as an investment in our people and our future. It is essential as we move into the next phase of NENY that you hold NYSERDA and the utilities accountable to our communities' evolving needs for an inclusive clean energy economy. We are ready to be your partners in this process.

In cooperation,

350Brooklyn, Mimi Bluestone, Co-leader
 350NYC.org, Margaret Perkins, Steering Committee,
 ALIGN, Jenille Scott, Climate Director
 All Our Energy, George Povall, Executive Director
 Alliance for a Green Economy, Jessica Azulay, Executive Director
 Alliance for Clean Energy NY, Deb Peck Kelleher, Deputy Director
 Association for Energy Affordability, Betta Broad , Director, Advocacy & Organizing
 Aztech Geothermal, LLC, John Ciovacco, President
 Basilica Hudson, Jared Widjeskog, Interim Executive Director
 Beacon Climate Action Now (BCAN), Veekas Ashoka,
 Bedford2030, Mariah Okrongly, Program Director
 Brooklyn For Peace, Charlotte Phillips, Chairperson
 Buffalo Energy, Inc., Seth Plyter, President & CEO
 Buffalo Geothermal LLC, Sandra Cathcart, Office Administrator
 Building Decarbonization Coalition, Malak Nassereddine, NY Senior Manager, Utility and
 Regulatory Policy
 Campaign for Renewable Energy, Brian Eden, Policy Coordinator
 Capital Region Interfaith Creation Care Coalition, Barbara Spink, Co-Chair
 Church Women United in New York State, Mary Smith, Communications Director
 Citizen Action of New York, Bob Cohen, Policy and Research Director
 Citizens' Climate Lobby, Brooklyn, Taylor Plante, Organizer
 Citizens' Climate Lobby, Rochester, Katie Rygg, Co-Lead
 Clean Air Action Network of Glens Falls, Tracy Frisch, Chair
 Climate Change Awareness & Action, George Lorefice, President
 Climate Crisis Working Group (IMV), Maggie Reilly, Leader
 Climate Reality Hudson Valley & Catskills chapter, Eve Morgenstern, Co-Chair
 Climate Reality Project Finger Lakes Greater Region NY Chapter, Thomas Hirasuna, Co-Chair
 Climate Reality Project NYC Chapter, Paul Kiesler, Co-chair
 CNY Solidarity Coalition, Peter McCarthy, Coordinating Committee
 Coalition Against the Rockaway Pipeline, Judith K Canepa, Coordinator
 Coalition to Protect New York, Maura Stephens, a cofounder
 Color Henrietta Green, Pat Wartinger, Chair, CHG
 ColorBrightonGreen , Cheryl Frank, President
 Committee to Preserve the Finger Lakes, Abi Buddington, Secretary
 Communities for Local Power, Jess Mullen, Executive Director
 Concerned Health Professionals of New York, Carmi Orenstein, Program Director
 E2 - Environmental Entrepreneurs , Ron Kamen, New York Chapter Director
 Earth Sensitive Solutions, LLC, John D. Manning, PE, President
 Earthjustice, Meagan Burton, Senior Attorney
 EarthKind Energy Consulting, Ron Kamen, Principal
 Elmirans and Friends Against Fracking, Doug Couchon, Co-Founder
 Energy Allies, Yesenia Rivera, Executive Director
 Environmental Advocates NY, Conor Bambrick, Director of Policy

Environmental Defense Fund, Karla Sosa, Project Manager, New York - New Jersey State Affairs
 Environmental Justice Ministry of First Unitarian Church of Rochester, John Keevert, co-chair
 Finger Lakes Climate Fund, Holly Hutchinson, Project Coordinator
 For the Many, Brahvan Ranga, political director
 Fossil Free Tompkins, Irene Weiser, Coordinator
 Frack Action, Renee Vogelsang, New York Director
 FrackBustersNY, Mary T. Finneran, co-founder
 Fridays For Future NYC, Keanu Arpels-Josiah, Policy Co-Lead
 Grassroots Environmental Education, Ellen Weininger, Director of Educational Outreach
 Green & Healthy Homes Initiative, Ruth Ann Norton, President and CEO
 Green Choices Consulting, Billii Roberti, President & CEO
 Green Party of Onondaga County, Howie Hawkins, Chair
 Green Team LI, Jay Best, CEO
 GreenFaith, Chelsea MacMillan, Reverend
 GreeningUSA, Peter Arsenault, Director, 12Traits of Sustainable Communities Program
 HabitatMap, Michael Heimbinder, Executive Director
 Halco Energy, Hal Smith, CEO
 Indivisible Scarsdale, Deborah Porder, Lead Organizer
 Interfaith Climate Justice Community of WNY, Roger A. Cook, Co-convenor, ICJC
 Justice Ministries Committee, Presbytery of NYC, Rev. Jeffrey Courter, Chair
 KC3, Daphany Rose Sanchez, Executive Director
 LaMorte Electric Heating and Cooling , Sarah Schnabel , Owner
 Long Island Progressive Coalition, Monique Fitzgerald, Climate Justice Organizer
 Melissa Carlson, Architect, Melissa Carlson, Owner
 Messiah Lutheran Church, Nancy Stuebner,
 Metro Justice, Mohini Sharma, Organizing Director
 Mothers Our Front - Northern Westchester , Donna OMalley, Leader
 Mothers Out Front Dutchess County, Caroline Fenner, Outreach and Communications
 Mothers Out Front New York, Bella Cockerell, NY State Manager
 Mothers Out Front Tompkins, Nora Brown, Southern Tier Organizer
 Mothers Out Front Westchester Rivertowns , Amy Hill, Volunteer Co-Leader
 Natural Resources Defense Council, Rich Schrader, Director of Government Affairs Northeast
 Network for a Sustainable Tomorrow, Adam Flint, Director of Clean Energy Programs
 New York Climate Action Group, JK Canepa, Co-Founder
 New York Communities for Change, Lucas Sanchez , Co-Director
 New York Energy Democracy Alliance , Amber Johnson, Organizing and Training Director
 New York Lawyers for the Public Interest, Justin Wood, Director of Policy
 New York League of Conservation Voters, Patrick McClellan , Policy Director
 New York Progressive Action Network, Cari Gardner, Vice Chair
 New York Public Interest Research Group, Meg Ahearn, Program Director
 New York Solar Energy Society, Wyldon Fishman, President
 New York State Public Health Association, Gus Birkhead, Chair, Policy and Advocacy Committee

New Yorkers for Clean Power, Lisa Marshall, Director of Organizing and Advocacy
 North American Climate, Conservation and Environment(NACCE), Jerry Rivers, Environmental
 scientist
 North Country Earth Action, Lisa Adamson, partner
 Northwest Bronx Indivisible , Daniel Guenzburger, co-chair NWBI Environmental Committee
 NY Climate Advocacy Project, Ruth Foster,
 NY Renews Coalition (370+ Member organizations) , Stephan Edel, Executive Director
 NYC 2030 District c/o Fund for the City of NY, Haym Gross, Chair, NYC2030
 NYC Friends of Clearwater, Edith Kantrowitz, Vice President
 NYC H2O, Matt Malina, Director & Founder
 NYCD16 Indivisible, Natalie Polvere, Environment Committee Co-Chair
 NYPAN of the Southern Finger Lakes, Mary Thorpe, Director
 Outdoor Promise, Ronald Zorrilla, Executive Director
 Peace Action New York State, Emily Rubino, Executive Director
 People for a Healthy Environment, Doug Couchon, Co-Founder
 Peoples Climate Movement NY, Laurel Tumarkin, Organizer
 Phoenix Energy Supply, John D. Manning, President
 Possible Rochester | Possible Planet, Victoria Zelin-Cloud, Director
 Pratt Center for Community Development, Rebekah Morris, Director of Climate Initiatives
 Progressive Schenectady, Katie Chao, Co-Lead Organizer
 PUSH Buffalo, Clarke Gocker,
 Putnam Progressives, B. R. Lemonik , Lead
 Queens Climate Project, Victoria Adler, Co-founder
 Ratepayer and Community Intervenors, Carol Chock,
 Renewable Heat Now, Andra Leimanis, Program Director at Alliance for a Green Economy,
 member organization of Renewable Heat Now
 Residents Allied for the Future of Tioga (RAFT), Gerri Wiley, Facilitator
 Rivers & Mountains GreenFaith, Michael Richardson, Co-Convener
 Riverside Salem UCC/DoC, Catherine Roeley -Goddard, Pastor
 RocACTS Climate Justice Task Force, Ruth Marchetti, Chair
 Rochester Area interfaith Climate Action (RAICA), Ruth Marchetti, Co-President
 Roctricity, LLC , Susan Hughes-Smith , Managing Partner
 RUPCO, Kevin O'Connor, CEO
 RYCOR, Jackie Martin, Energy Auditor
 Safe Energy Rights Group (SEnRG), Nancy Vann, Co-founder
 Sane Energy, Jennifer Whitburn,
 Sane Energy Project, Kim Fraczek, Director
 Seneca Lake Guardian , Yvonne Taylor , Vice President
 Sierra Club Mid-Hudson Group, Lalita Malik, Chair, Sierra Club Mid-Hudson Group
 Sierra Club Susquehanna Group, Valdi Weiderpass, Chair
 Sisters of St. Dominic of Blauvelt, New York, Sr. Joan Agro, OP, Congregational Secretary
 Sixth Street Community Center , Jen Chanttanapichate, Deputy Executive Director
 Solar One, Kate Selden, Senior Policy Manager
 Solarize Albany, William Reinhardt, President

South Asian Fund For Education Scholarship and Training Inc, MAZEDA UDDIN, CEO
 South Bronx Unite, Arif Ullah, Executive Director
 Stop NY Fracked Gas Pipeline, Robert Connors, Board Member and Founder
 Stop the Algonquin Pipeline Expansion , Susan Van Dolsen, Co-founder
 Students for Climate Action, Melissa Parrott, Executive Director
 Sullivan Alliance for Sustainable Development, Linda Reik, Board of Directors, member
 Sunrise Movement NYC, Andrew Engel, Legislative Team Lead
 SUNY New Paltz Environmental Task Force, Daniel Lipson , Co-chair
 Sustainable Finger Lakes, Gay Nicholson, President
 Sustainable Warwick, Michael Helme, Steering Committee Member
 Syracuse Peace Council, Carole Resnick, Climate Action Coordinator
 The Clean Air Coalition of WNY, Bridge Rauch, Environmental Justice Organizer
 The Climate Reality Project, Western New York Chapter , Lynn Saxton , Chair
 The Climate Solutions Accelerator of the Genesee-Finger Lakes Region, Kristen Van
 Hooreweghe, Senior Director of Programs
 The Park Church in Elmira, Doug Couchon, Chair, Climate Justice Team
 The Public Utility Law Project of New York, Theresa A. Hotte, Esq., Litigation and Policy
 Counsel
 Third Act Upstate New York, Andrew Foster, Co-Liaison Democratize Energy Action Group
 Tompkins County Climate Protection Initiative, Peter Bardaglio, Coordinator
 Tompkins County Progressives, Emily Adams, Chair
 UHAB, Caleb Weil, Climate & Resiliency Team
 United for Action, Ling Tsou, Co-founder
 United For Clean Energy, Tina Volz-Bongar, Co-organizer, authorized signatory
 Urban Green Council, Chris Halfnight, Senior Director, Research and Policy
 Urban Jobs Task Force of Syracuse, Tylah Worrell, Executive Director
 Urbecon LLC, Martha Sickles, Principal
 UU Congregation of Binghamton, Green Sanctuary, Wes Ernsberger, Chair
 Vote Solar, Lindsay Griffin, Regulatory Director, Northeast
 WE ACT for Environmental Justice, Eric Walker, Senior Policy Manager for Energy Justice
 WESPAC Foundation, Inc., Nada Khader, WESPAC Executive Director
 Westchester Alliance for Sustainable Solutions (WASS), Courtney M. Williams, Founder
 Western New York Drilling Defense, Charley Bowman, Chair

CC: Commissioner Bright
 Commissioner Sheehan
 Commissioner Maggiore
 Commissioner Valesky
 Commissioner Alesi