



Homes and Community Renewal

KATHY HOCHUL

Governor

RUTHANNE VISNAUSKAS

Commissioner/CEO

April 2, 2024

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

SUBJECT: Comments on New York State Public Service Commission (PSC) CASE 14-M-0094 - Proceeding on Motion of the Commission to Consider a Clean Energy Fund and CASE 18-M-0084 - In the Matter of a Comprehensive Energy Efficiency Initiative

Dear Secretary Phillips,

New York State Homes and Community Renewal (“HCR”) congratulates and supports the DPS for issuing the New Efficiency New York (“NE:NY”) framework for Clean Energy Funding as an additional funding source for clean energy and energy efficiency improvements. HCR is responsible for advancing New York State’s affordable housing goals through Governor Hochul’s 5-year Housing Plan. The Housing plan advances the Climate Leadership and Community Protection Act of 2019 (“CLCPA”) goals and carbon reduction targets to reduce our state’s greenhouse gas emissions by at least 40% by 2030 and 85% by 2050. NYS HCR is committed to offering programs such as the Clean Energy Initiative (“CEI”) and Climate Friendly Homes Fund (“CFHF”) as part of the Housing Plan to meet the state’s greenhouse gas reduction goals.

We appreciate the opportunity to provide comments on the material submitted by both NYSERDA and the utilities as part of the NE:NY Clean Energy Fund Rate Case procedure led by DPS. As you will see our comments focus on three areas: to design the program in collaboration with existing market awareness; support LMI households to reach towards and up to full decarbonization; and to streamline administration of the program for the customer. HCR is excited to support and further collaborate with these entities to deliver energy efficiency and decarbonization services to the affordable housing communities of New York State.

We welcome the opportunity to discuss or review at your convenience.

Sincerely,

RuthAnne Visnauskas

Commissioner/CEO New York State Homes and Community Renewal

Program Administration: We encourage DPS to ensure all Program Administrators (“PA”) of rate payer funds under the NE:NY plan align their funding and incentive offerings across various programs and markets where appropriate to ensure customer access is clear and consistent.

- Ensure all affordable multifamily buildings can be served, regardless of any internal PAs’ categorical affordability designation. Where appropriate we encourage the PAs to coordinate with municipal and State housing financing agencies to define these terms based on existing federal and State definitions.
- The LMI Joint Management Committee (“JMC”) should be required to make their decision-making processes available to DPS and State agencies, so that energy efficiency program changes are made in a fair, transparent, and expedient manner.
- We encourage DPS to require all PAs to develop a joint referral process that would allow customers to take advantage of all funding sources they qualify for and more efficiently schedule program participation. This would ensure the most expedient use of government and ratepayer funds and promote a streamlined customer experience.
- We encourage DPS to allow PAs to include eligible budget lines that adequately cover expenses for community/customer outreach and education. This budget allowance should include requirements from DPS that support coordination between PAs to develop uniform, multilingual material and a robust, regional communication plan that caters to DACs and LMI communities.
- We are in support of the NYSERDA proposal documenting health and safety measures as neutral and fundable measures as part of their proposed plan. This would align with HCR’s Weatherization Assistance Program (“WAP”) structure and could allow for coordination of funds.
- The proposed shared project database would be a boon to overall coordination between all entities involved. We request DPS require incremental deadlines to hold PAs accountable for delays.

Program Design: Both NYSERDA and the downstate utilities, Con Edison and National Grid, provided proposals that will further support the State’s goals of decarbonization. To reach LMI households, we encourage DPS to consider expanding on those proposed ideas and/or revise to allow for streamlined access:

- The Clean Energy Initiative (“CEI”) program, operated jointly by HCR and NYSERDA, directly allocates NYSERDA funding into HCR-funded affordable housing. We encourage DPS to continue supporting this successful model for streamlining both affordable housing and decarbonization funds to LMI housing developers. HCR can directly deploy rate payer funds to the LMI housing portfolio of regulated affordable housing efficiency and effectively, by leveraging other State and federal sources. We encourage DPS to expand opportunities for direct allocation funding with both affordable housing agencies at the municipal and State level.
- Con Edison provided a robust Expanded Portfolio Plan that would increase savings from building envelope measures compared with current program offerings available. This approach could fill a gap of funding in the market that existing programs, including the federally funded Weatherization Assistance Program, are not able to cover.

- We agree with Con Edison’s proposal to incentivize partial electrification and electrical infrastructure upgrades. We encourage DPS to allow a portion of rate payer funding to go towards non-direct MMBTU or Carbon emissions savings, but that will fund enabling scopes of work for future reductions, such as health and safety work that is necessary for future beneficial electrification.
- Across NYS there is still a need for incentives to support energy efficiency measures where larger capital replacement projects cannot be achieved. Scopes of work such as steam traps, boiler control repairs, and pipe insulation can still aid in efficiency without slowing down the electrification process. We encourage DPS to allow a portion of rate funding to be used for these purposes where an LMI/DAC owner can demonstrate financial hardship or end-of-useful-life constraints that do not justify full replacement.
- When considering KeySpan Gas East Corporation d/b/a National Grid Long Island (“KEDLI”) funding allocation through 2025, we urge National Grid to consider expending more funds in the Rockaways. Currently HCR oversees over 45 properties that could be eligible.