

# **Statewide Low- and Moderate-Income Portfolio 2020 Stakeholder Input Companion Document**

Jointly Filed By:

The Brooklyn Union Gas Company d/b/a National Grid NY  
Central Hudson Gas & Electric Corporation  
Consolidated Edison Company of New York, Inc.  
KeySpan Gas East Corporation d/b/a National Grid  
National Fuel Gas Distribution Corporation  
Niagara Mohawk Power Corporation d/b/a National Grid  
New York State Electric & Gas Corporation  
New York State Energy Research and Development Authority  
Orange and Rockland Utilities, Inc.  
Rochester Gas and Electric Corporation

Filed: July 24, 2020

Case 18-M-0084

Case 14-M-0094

Pursuant to New York Public Service Commission Order Adopting Accelerated  
Energy Efficiency Targets  
and  
Order Authorizing Utility Energy Efficiency and Building  
Electrification Portfolios Through 2025

## Contents

<i>Contents</i> .....	2
<i>1. Introduction</i> .....	3
<i>2. 2020 Stakeholder Outreach and Education Opportunities</i> .....	4
Preparatory and Regional Stakeholder Webinars .....	4
Post-Webinar Survey .....	5
Dedicated Email Inbox .....	6
Parties' Filed Comments .....	6
<i>3. Review of Stakeholder Input</i> .....	7
General Comments and Suggestions: .....	7
Portfolio and Program Administration .....	18
Eligibility.....	20
Budgets, Benefits, and Performance Metrics. ....	22
Customer Awareness, Outreach & Engagement .....	23
1-4 Family Homes.....	29
Multifamily.....	31
Affordable New Construction .....	34
Workforce Development .....	34
Beneficial Electrification .....	35
Coordination with External Stakeholders .....	37
COVID-19.....	38
Pilots.....	39
Benefit Cost Analysis.....	40
Contractors .....	41

## 1. Introduction

Pursuant to the New York State (“NYS”) Public Service Commission’s (“Commission”) January 16, 2020 Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios through 2025 (“Implementation Order” or “Order”),<sup>1</sup> the New York State Energy Research and Development Authority (“NYSERDA”) and the New York Utilities<sup>2</sup> (“Utilities”) (collectively, “Program Administrators”) are simultaneously filing the statewide Low- and Moderate-Income (“LMI”) Implementation Plan (“Implementation Plan” or “Plan”) and this Companion Filing, summarizing stakeholder input.

Stakeholder input is essential to the success of the statewide portfolio of initiatives for LMI customers (“Statewide LMI Portfolio” or the “Portfolio”) and will be requested on an ongoing basis. As the Implementation Plan is set in motion, formal and informal sessions will be scheduled to discuss the performance of programs and solicit suggestions, comments, and recommendations. This information will be reviewed and considered by the Joint LMI Management Committee.<sup>3</sup> The development and implementation of the Statewide LMI Portfolio will require alignment of the initiatives with the investments currently in place. The Statewide LMI Portfolio will be aligned periodically based on a review of program performance, evaluations, and stakeholder input.

As directed in the Order, NYSEDA and the Utilities hosted a series of stakeholder sessions, including a pre-stakeholder meeting webinar and three regional stakeholder webinars, during March and April 2020 to provide background on the upcoming filing and solicit comments to inform the development of the Implementation Plan.<sup>4</sup>

Some feedback received through this stakeholder engagement process has been incorporated into the Implementation Plan, some comments will inform the program planning that will take

---

<sup>1</sup> Case 18-M-0084, *In the Matter of a Comprehensive Energy Efficiency Initiative* (“NE: NY Proceeding”), Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios Through 2025 (issued January 16, 2020) (“Implementation Order”).

<sup>2</sup> Central Hudson Gas & Electric Corporation (“Central Hudson”); Consolidated Edison Company of New York, Inc. (“Con Edison”); KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”), The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”), Niagara Mohawk Power Corporation d/b/a National Grid (“Niagara Mohawk”)(collectively “National Grid”); National Fuel Gas Distribution Corporation (“NFGDC” or “NFG”); New York State Electric & Gas Corporation (“NYSEG”); Orange and Rockland Utilities, Inc. (“Orange & Rockland”); and Rochester Gas and Electric Corporation (“RG&E”) (collectively, “Utilities”). The Utilities with electric operations are referred to as “NY Electric Utilities.”

<sup>3</sup> NE: NY Proceeding, Implementation Order, p. 101. The Order established the LMI Management Committee. The LMI Management Committee consists of NYSEDA and Utilities with oversight from Department of Public Service Staff.

<sup>4</sup> NE: NY Proceeding, Implementation Order, p. 102.

place during 2020, and others have been reviewed and determined to be beyond the purview of the Implementation Plan. The input received is organized below into categories to align with the structure of the Implementation Plan filing.

## 2. 2020 Stakeholder Outreach and Education Opportunities

During the first half of 2020, the Program Administrators received stakeholder feedback via five channels:

- Preparatory stakeholder webinar in advance of regional stakeholder meeting webinars
- Three regional stakeholder webinars
- Post-webinar survey of participants from the regional webinars
- Comments to [LMIforum@nyserda.ny.gov](mailto:LMIforum@nyserda.ny.gov)
- Interested parties directly submitted comments to the New York State Department of Public Service (“DPS”)

### Preparatory and Regional Stakeholder Webinars

The preparatory stakeholder webinar provided background information on the Implementation Order, the process being used to develop the Implementation Plan, and what to expect during the three regional stakeholder sessions.<sup>5</sup> Participants were able to ask questions and provide comments during the webinar.

Three regional in-person sessions were planned for April 2020 to discuss plans for the Portfolio and obtain comments from participants. Due to the COVID-19 PAUSE restrictions on in-person gatherings, those sessions were rescheduled and held via webinar. During each regional webinar, as in the preparatory webinar, attendees were provided the opportunity to ask questions and provide comments. Following the completion of the last regional webinar, the slide presentation was posted on the DPS’s Document and Matter Management (“DMM”) system.<sup>6</sup>

The preparatory stakeholder webinar and regional webinars were attended by over 300 stakeholders representing human service and community-based organizations, advocates, local government, contractors, installers, developers, and vendors. Invitations with registration

---

<sup>5</sup> NE: NY Proceeding, Preparatory Stakeholder Webinar Presentation (Filed March 19, 2020), <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={84CB42CE-4F14-4D40-B510-7F4E861562E5}>.

<sup>6</sup> NE: NY Proceeding, Regional LMI Stakeholder Webinar Presentation (filed April 20, 2020), <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={267E8174-CE26-42B1-BC5C-0712523074E0}>.

information for the preparatory stakeholder webinar and the regional webinar series were sent to stakeholders electronically and posted on DMM.

Table 1. Stakeholder Webinar Schedule

Date	Time	Session type	Utility Territories Represented	Participants
March 9, 2020	2:00 PM – 3:30 PM	Preparatory-Stakeholder Webinar	All	69
April 14, 2020	10:00 AM – 12:00 PM	Regional Webinar	Central Hudson, Orange & Rockland, National Grid (Niagara Mohawk)	91
April 14, 2020	2:00 PM – 4:00 PM	Regional Webinar	Con Edison, National Grid (KEDNY), National Grid (KEDLI)	109
April 15, 2020	2:00 PM – 4:00 PM	Regional Webinar	National Fuel Gas Distribution, New York State Electric & Gas, Rochester Gas & Electric, National Grid	106

### Post-Webinar Survey

At the end of each regional webinar, the Program Administrators informed attendees that a survey would be sent requesting feedback on the presentation and the development of the Implementation Plan. Nine stakeholders responded to the survey. Most respondents agreed that the Portfolio objectives aligned with the LMI market segment. Respondents also provided feedback regarding their preferences of how the Program Administrators should conduct future stakeholder engagement.

The survey also included opened-ended questions. Responses covered a wide range of considerations and offered possible solutions for LMI customers and communities. The comments included requests for clarification of the multifamily initiatives; suggestions for how to maximize the Customer Hub;<sup>7</sup> the need to address health and safety issues; electrification; outreach and education; and the need for follow-up on previous stakeholder questions – in particular the comments made in the Assessment of Input Received at the 2018 LMI Stakeholder Forums (“January 2019 filing”).<sup>8</sup>

<sup>7</sup> As is noted in the Implementation Plan, the Customer Hub is now referred to as NY Energy Advisor: for Income Eligible Energy Efficiency Programs (“NY Energy Advisor”). Unless preserved as part of an original stakeholder comment or question, this document uses NY Energy Advisor in place of “Customer Hub.”

<sup>8</sup> NE: NY Proceeding, Assessment of Input Received at 2018 LMI Stakeholder Forums (filed January 31, 2019).

## Dedicated Email Inbox

Attendees of the four webinars were encouraged to submit any further comments, questions or suggestions via the email address, [LMforum@nyserda.ny.gov](mailto:LMforum@nyserda.ny.gov).

One party submitted comments to the email inbox on April 23, 2020.

## Parties' Filed Comments

The following parties filed comments on DMM in Case 18-M-0084:

- The City of New York
- Association for Energy Affordability

### 3. Review of Stakeholder Input

The Program Administrators considered the input in the context of the Order requirements including budgets and targets, and the phased approach for developing and implementing the Statewide LMI Portfolio. The development of the Portfolio is expected to continue throughout 2020, and the Program Administrators expect the Portfolio to evolve over time. If there are stakeholder comments that cannot be addressed with the Implementation Plan, they will be addressed and incorporated during the redesign of programs.

Below, the Program Administrators provide additional context where necessary, considerations on issues, and the current status on input received. Some comments are beyond the purview of the Program Administrators and some require coordination with or action from other parties. In those instances, it is noted in the status section.

#### General Comments and Suggestions:

1. *In the fall of 2018, NYSERDA and DPS came to eight communities around New York to discuss ways to address LMI energy efficiency, which culminated in the January 2019 filing. It was expected that many implementation issues and plans would be addressed in the Implementation Plan. For transparency, identify which of those are addressed in the Implementation Plan and an explanation as to what was addressed and what was not.*

#### Discussion:

When developing the Implementation Plan, the Program Administrators evaluated the comments and recommendations included in the January 2019 filing and identified 15 comments that should be addressed in the development of the Statewide LMI Portfolio. The remainder of the comments, while important to consider in the advancement of access and affordability, require decision making and effort beyond the purview of the Statewide LMI Portfolio. The 15 comments and how they are being addressed in the context of the LMI Portfolio are outlined below:

- 1.1 *While the New Efficiency: New York (“NE: NY”) proposal recommends that a minimum of 20% of new ratepayer funds be allocated to LMI, additional funds are necessary to increase the number of LMI households adopting clean energy services. At least 40% of allocated funds should be directed to benefit low-to-moderate-income households.*

Status: Pursuant to the Accelerated Efficiency Order,<sup>9</sup> which requires that a minimum of 20% of new funds be allocated toward LMI customers, the Utilities have allocated 20% of their incremental budgets to LMI initiatives. The LMI Portfolio budget also includes additional funding that National Grid (KEDLI) will be investing from their Energy Efficiency Transition Implementation Plan/System Energy Efficiency Plan (“ETIP/SEEP”) portfolio to support the Home Energy Affordability Team (“HEAT”) program and from NFGDC’s pre-existing LMI funding and performance targets that were approved in its February 2019 ETIP/SEEP filing to support its Low Income Usage Reduction Program (“LIURP”). At the time of the filing of the LMI Implementation Plan, the total budget for the LMI Portfolio is \$880.25 million through 2025. However, the Program Administrators will continue to assess resource allocations and modify the plan if appropriate.

*1.2 Increased funding to address health and safety and structural deficiencies in homes, in conjunction with energy upgrades, is necessary. In many cases, additional investment to address deficiencies can open the possibility of achieving energy efficiency potential that would not be possible.*

Status: NYSERDA is currently working with the NYS Department of Health on the NYS Healthy Homes Value Based Payment Pilot, with the goal of quantifying healthcare cost savings associated with healthy homes interventions. In addition, the Program Administrators will work to better coordinate energy efficiency programs and resources with local housing and health resources in an effort to address the structural deficiencies or health and safety issues that can prevent energy efficiency work from being done. Health and safety under the Statewide LMI Portfolio are further addressed in question 5, below.

*1.3 Benefit/cost analysis (“BCA”) for LMI programs should be more lenient and/or include non-energy benefits to capture the full value of the benefits derived from the investment.*

Status: The Implementation Order allowed for the BCA ratios to be lower than 1.0, given the relatively higher costs associated with administering LMI

---

<sup>9</sup> NE: NY Proceeding, Order Adopting Accelerated Energy Efficiency Targets (issued December 13, 2019) (“Accelerated Efficiency Order”).

programs. The LMI Portfolio preliminary BCA is provided in Section 7 of the Implementation Plan. The Portfolio and program performance will be reviewed by the Joint LMI Management Committee on an ongoing basis and modifications will be made where necessary to improve impact.

*1.4 Program design should consider and address regional differences in housing stock, climate, and demographics across the state.*

Status: During the “Transitional Phase” the Program Administrators will explore how program design and implementation could be modified to better account for regional differences for all programs.

*1.5 Reduction in energy waste and reducing energy burdens should be the primary goals of LMI clean energy initiatives.*

Status: Increasing energy efficiency by reducing the energy burden for LMI customers has been and will continue to be a primary objective of the Statewide LMI Portfolio.

*1.6 An integrated approach for administering bill payment assistance, energy efficiency, and solar program is necessary. While energy efficiency should be the priority, bill payment assistance and solar should be viewed as complementary. For some residents, such as renters, bill payment assistance and access to community solar may be the only option to reduce energy bills where the landlord is not willing to undertake energy efficiency improvements.*

Status: As a matter of advancing energy affordability for LMI households, the Program Administrators believe that all opportunities to reduce energy bills should be considered, however energy efficiency upgrades can provide longer-term savings in the heating of a home, by addressing envelope and Heating, Ventilation, and Air Conditioning (“HVAC”) opportunities. While redesigning the energy efficiency programs in 2020, the Program Administrators will consider opportunities for better aligning and coordinating energy efficiency improvements with other interventions to reduce energy bills such as bill discounts and access to renewable energy.

*1.7 Ratepayer-funded programs should address multifamily buildings in a comprehensive manner by focusing on both central system improvements as well as envelope and in-unit upgrades.*

Status: The Program Administrators are in the process of reviewing the current affordable multifamily initiatives and will be making modifications in 2021 during the Transitional Phase of the Implementation Plan to address the affordable multifamily sector in a more holistic way by focusing on incentives for comprehensive upgrades and technical assistance for building owners and housing agencies.<sup>10</sup>

*1.8 NYSEDA and the Utilities should include direct install or other light-touch measures in order to expand the reach of energy efficiency programs to residential properties that may face barriers to comprehensive energy efficiency retrofits.*

Status: Direct install is currently offered as part of EmPower New York (“EmPower NY”) and the Con Edison and National Grid multifamily programs. The Program Administrators plan on incorporating additional direct install opportunities as programs are modified for 2021.

*1.9 NYSEDA or the Utilities should consider aggregation of LMI energy efficiency projects to reduce the cost of administration.*

Status: As the Program Administrators modify existing programs during the Transitional Phase, they will explore opportunities to incorporate alternate delivery models, including aggregation of projects to reduce administrative costs and potentially streamline customer enrollment and project completion timelines.

*1.10 Electrification for LMI residents should be a priority, paired with energy efficiency. Heat pump adoption in the LMI market segment should begin with the conversion of electric resistance heat to heat pumps.*

Status: Developing solutions for beneficial electrification for LMI households and affordable multifamily buildings is a priority for the Program

---

<sup>10</sup> Implementation Plan, Section 4.2.1.

Administrators. As outlined in the Implementation Plan, the Program Administrators will be investing \$30 million<sup>11</sup> to advance models for electrification in the LMI space beginning in 2020.<sup>12</sup> These investments will focus on assessing policy and institutional barriers associated with affordable housing and current bill payment assistance programs so that heat pump installations can improve energy affordability while also removing the potential for the cost for heat to be passed on to tenants, where heat had been included in rents. In addition to these assessments, funding will be directed towards incentives to fund heat pump installations, and to demonstrate or pilot electrification models for the LMI market segment. These investments are expected to inform additional, future investment to support heat pump adoption among LMI households and in affordable housing. (See question 41)

*1.11 NYSEDA and the Utilities should consider how to provide some level of assistance to households that are just over the income thresholds to qualify for program subsidy.*

Status: As part of the Transitional Phase during 2020, the Program Administrators will be assessing and incorporating considerations for improving access to LMI initiatives, including a graduated incentive schedule for 1-4 family programs, and the use of geographic-eligibility to establish eligibility for customers and buildings. These modifications will be implemented in 2021. (See question 14)

*1.12 A single point of entry or streamlined program application process is required to reduce the administrative burden placed on applicants and can facilitate the auto referral of applicants into other relevant programs. The state should begin the streamlining by creating a single program platform for LMI clean energy initiatives.*

Status: As part of the redesign of programs in 2020, the Program Administrators will be identifying opportunities for streamlining the application process for programs to ensure that customers have access to the complementary offerings that will be available. The NY Energy Advisor

---

<sup>11</sup> In addition to the \$30 million investment in beneficial electrification represented here, NYSEDA is investing an additional \$1 million as part of this work under the CEF.

<sup>12</sup> Implementation Plan, Section 4.5.

website will make it easier for customers to find and apply for all initiatives including offerings in the Portfolio as well as for other programs (e.g. Home Energy Assistance Program (“HEAP”, Weatherization Assistance Program “WAP”) for which they may qualify.

*1.13 State agencies and the Utilities should develop a protocol for sharing data relevant to customer participation in programs to facilitate a streamlined application process and auto referral.*

Status: The Utilities and NYSERDA recognize the benefits data sharing will bring to the Portfolio and will continue to work through the challenges of implementing due to important customer privacy and cybersecurity considerations; the Program Administrators will address this as part of the 2020 redesign of programs, to enable streamlined application process for customers and administration of the Portfolio.

*1.14 To avoid confusion about the different clean energy programs and various program administrators, NYSERDA and the Utilities should consider coordinating outreach and co-branding to present the various program offerings in a cohesive and easy to understand format across all utility service territories.*

Status: An effective, statewide brand for the Portfolio will be developed by the Program Administrators to provide a consistent foundation for all marketing and engagement activities. Just as the evolution of appropriately harmonized statewide program design elements can increase effectiveness in program delivery by reducing confusion, an effective statewide brand can provide more consistent messaging, and increase awareness of the Portfolio. Brand identification, leading customers and affordable housing owners to initiatives and services, will contribute to the success of the Statewide LMI Portfolio. The statewide brand will be used in conjunction with localized marketing implemented by the Utilities in their respective territories. The Program Administrators will also be launching the NY Energy Advisor website which will allow for a more cohesive, easy to understand access point for customers to learn about LMI initiatives. The Program Administrators will continue to access coordination of outreach and education opportunities.

*1.15 NYSERDA and the Utilities should ensure that information on*

*program and opportunities is made available to human service providers, contractors, and other trusted members of communities that may be in a position to refer clients into relevant programs.*

Status: The Program Administrators will continue to facilitate partnership opportunities with community-based organizations (“CBOs”) and local government as part of the outreach and marketing efforts for the Portfolio to increase LMI customer awareness of and participation in energy efficiency and clean energy programs.

Human service providers, contractors and any interested community partner(s) have been and will continue to be encouraged to join the Low-Income Forum on Energy (“LIFE”) dialogue and activities.

Information about the NY Energy Advisor website and collateral materials will be made available to CBOs, providing their clients with access to up-to-date information on LMI initiatives, services, and education.

In the future, the Program Administrators will take advantage of the opportunity to meet with stakeholders during LIFE sessions to provide updates and seek input on the Portfolio.

## 2. *How will the Implementation Plan address increased enrollment?*

### Discussion:

The Program Administrators expect that the development of the Statewide LMI Portfolio and the NY Energy Advisor website, will drive an increase in program participants. The NY Energy Advisor will be complemented by a coordinated, statewide outreach and engagement campaign that will combine marketing and advertising with local CBOs and other interested community partners. From these outreach, awareness and engagement efforts, we expect to see an increase in eligible customers. This will include an effort to build outreach capacity to attract customers who have not applied for services in the past.

To complement efforts to increase participation, the Program Administrators will focus on workforce development to ensure sufficient market capacity to handle the demand for Portfolio initiatives. To address the gap between the expected increase in program participants and the resulting need for additional contractors,

NYSERDA will invest \$70 million over the next 10 years in clean energy workforce development and training. This funding will provide: training for building and operations staff to properly operate and maintain building systems; classroom and on-the-job training for new clean energy technology installers and maintenance workers; internship support for students looking to gain hands-on skills at a clean energy company; enhanced curricula to meet the demands of clean energy employers; establishing a talent pipeline that can reduce the business cost of hiring new workers.

Status:

In addition to details about individual initiatives in the Portfolio, the Implementation Plan includes a section describing the Portfolio's outreach, education and awareness initiatives. The Joint LMI Management Committee will, on an ongoing basis, seek feedback from stakeholders on the initiatives and adjust customer outreach strategy accordingly, to ensure ongoing effectiveness in driving program participation, energy savings and customer satisfaction.

3. *There should be flexibility to carry over or advance funds from one year to the next.*

Discussion:

The Program Administrators agree with the principle of flexibility to carry over or advance Portfolio funds from one year to the next. The Implementation Order states, "Current practice allows utilities to shift budgets from year to year within a portfolio to accommodate the timing concerns that arise with commitments and outlays and to avoid artificial program stops and starts."<sup>13</sup>

Status:

The Program Administrators will monitor the Portfolio's budgets and targets so that targets are met without affecting commitments of long lead time equipment upgrades.

4. *There are opportunities to achieve multiple state goals by supporting direct oil to electric conversions – eliminating the use of fuel oil has clear air quality and associated health benefits, especially for children. Additional tiers or funds should be made available to LMI customers who use #2 and #4 fuel oil, provided there is a demonstration of the energy efficiency, air quality, and health benefits of the project.*

---

<sup>13</sup> NE: NY Proceeding, Implementation Order, p. 69.

Discussion:

Conversion of oil heat to electric heat is one of the priorities for the beneficial electrification work that is being advanced through the NYS Clean Heat Implementation Plan.<sup>14</sup> With the availability of funding to support heat pump conversions, the Program Administrators will be able to support customers who are interested in converting from oil to electric. For LMI households and affordable multifamily buildings, the Program Administrators will explore opportunities to address the institutional barriers and consumer protection issues that are present in the LMI market space.

Status:

In addition to the \$250 million in funding allocated through the NYS Clean Heat filing in 2020,<sup>15</sup> NYSERDA is investing \$30 million through the Clean Energy Fund (“CEF”) to explore opportunities to increase adoption of heat pump solutions in the LMI market segment, including conducting analysis on institutional barriers and other challenges that may prevent installation of heat pumps, providing incentives to LMI projects, and funding demonstrations and pilots to identify scalable models for heat pump deployment in this space.

5. *Health and safety issues are often a barrier to providing energy efficiency services to LMI households. Are there plans to address health and safety concerns that are often a barrier to providing energy efficiency measures?*

Discussion:

Energy efficiency programs must consider the balance of funding being allocated to energy efficiency improvements and non-energy costs. Some health and safety improvements, such as gas leak repairs, ventilation, carbon monoxide, and smoke detectors are currently included in some energy efficiency programs. Unfortunately, the cost of some health and safety work, such as mold abatement, may exceed the budgets for energy efficiency programs and can lead to project deferral. However, the Program Administrators are currently exploring opportunities to address health and safety needs in a more meaningful way. NYSERDA is working with the NYS Department of Health on a pilot to reduce asthma triggers in home through healthy homes interventions, which include

---

<sup>14</sup> See, NE: NY Proceeding, NYS Clean Heat: Statewide Heat Pump Program Implementation Plan (filed March 16, 2020 and updated May 29, 2020).

<sup>15</sup> *Id.*, Appendix A.

energy efficiency upgrades. The Program Administrators also coordinate programs with local housing and health programs to bring wraparound services, where possible.<sup>16</sup> In addition, the Program Administrators will explore additional opportunities to pilot and test approaches for increasing the incorporation of health and safety improvements as part of energy efficiency work scopes.

Status:

The Program Administrators will continue to explore opportunities to increase investment in health and safety improvements as part of energy efficiency work scopes.

6. *Once a customer submits an application, there should be multiple means (i.e., not just online) for the customer to check on the status of their submissions. Additionally, the customer should be able to access information on the amount of programmatic funding approved, the funds expended, and the balance that remains.*

Discussion:

The Program Administrators agree that streamlining access to programs and improving transparency for customers during the application and project implementation phases is important; however, program administrative systems that are currently in place do not support this functionality. As part of the Transitional Phase of activity during 2020-2021, the Program Administrators will explore how to improve program application processes and the transparency of the status of projects throughout the process.

Status:

The Program Administrators will explore opportunities to streamline program participation for customers, as well as look for opportunities to keep customers apprised of the status of their projects in the program pipeline.

7. *The Statewide LMI Portfolio should include funding for consultants to provide information and technical assistance to housing agencies, affordable housing developers, and other affordable housing decision makers on best practices and new technologies. This information should be provided regularly via direct contacts, newsletters, email blasts, and/or other means. Additionally, the Portfolio should include support for owner representation services to oversee building upgrades and improvements and ensure that*

---

<sup>16</sup> Wraparound services are services that are outside of an LMI initiative that facilitate participation in the initiative.

*installations and work is performed properly (this funding also could help reduce the monitoring and verification required for such projects).*

Discussion:

To increase the energy performance of affordable housing, it will be necessary to not only incentivize energy efficiency work scopes, but also provide technical support to builders and developers, and help to build capacity within housing agencies to assess and enforce building performance requirements. NYSERDA currently offers technical assistance to developers, builders, and owners in the form of subsidized engineering studies; consultation to developers; case studies and highlights of best practices; and supporting housing agencies in the adoption of Integrated Physical Needs Assessments. NYSERDA will build on this work to provide technical support to builders, developers, housing agencies, and owners, through the Statewide LMI Portfolio.

Status:

The Statewide LMI Portfolio will fund technical assistance for preservation and new construction projects as well as housing agencies.

8. *Throughout the LMI Implementation Plan, the Program Administrators can make more efficient use of their investment per dollar by leveraging the power of data to target the right customers and promote the right actions.*

Discussion:

Access to data can improve targeting of programs, validate performance, influence decision making of potential program participants, and reduce administrative burdens and cost.

Status:

The Program Administrators will continue to explore opportunities to access and use customer data to improve the impact of programs and streamline application processes for customers while maintaining cybersecurity and respecting customers' privacy.

9. *Financing options will be critical to increasing uptake and supporting the entry of private capital for market transformation. Will financing options be provided in addition to and not instead of incentives?*

Discussion:

The Portfolio of initiatives described in the Implementation Plan does not include financing options. New York State currently offers low-interest financing options for clean energy projects through Green Jobs-Green New York, administered by NYSERDA.

Status:

The Program Administrators will continue to seek opportunities to increase access to finance solutions in the LMI market segment.

10. *It is important to find resources for LMI customers, so those customers benefit from 100% renewable energy via Community Choice Aggregation.*

Discussion:

Community Choice Aggregation (“CCA”) can be an important tool for helping to provide local decision making with respect to the source of their electricity. However, CCA is beyond the scope of the LMI energy efficiency portfolio. NYSERDA supports the adoption of CCA in municipalities through the Clean Energy Communities Program<sup>17</sup> and will continue to seek opportunities to support adoption of CCA.

Status:

This comment is beyond the scope of the LMI Portfolio.

## Portfolio and Program Administration

11. *There is a recognition the Program Administrators must coordinate their initiatives in overlapping territories in order to avoid duplication and maintain statewide consistency in program design and delivery. One way to avoid that issue is lead sharing. Are you considering program design that would have complimentary, not duplicative initiatives and evaluating possible synergies and ways to streamline the process?*

Discussion:

The Statewide LMI Portfolio will leverage the respective strengths of the Program Administrators in the development and implementation of the Statewide LMI Portfolio. NYSERDA brings the statewide reach and market development components of the CEF, while the Utilities bring their relationship with their

---

<sup>17</sup> See, <https://www.nyserdera.ny.gov/All-Programs/Programs/Clean-Energy-Communities>.

customers and their knowledge of local communities. Customers, contractors, and community organizations will see a commonly branded portfolio of statewide initiatives that span the LMI housing sector, from single family to large multifamily buildings, including new construction. While the Commission directed the Program Administrators to consider regional characteristics within the Portfolio, the branding and structure of each of the programs will be consistent across the state. Customers, contractors and stakeholders will be able to participate through NY Energy Advisor, a single, statewide online website. The consolidation of programs will reduce confusion, make it easier for stakeholders to promote and support the programs, improve the customer participation experience and deliver clean energy services more rapidly and efficiently.

Status:

Throughout the initiatives section of the Implementation Plan, details are included on design of each initiative within the Portfolio, as well as the working relationship between the Program Administrators.<sup>18</sup>

12. *Describe the specifics on NYSERDA's role vs. the Utilities' in offering incentives, the terms and procedures for the incentives, specific timeline for coordination/integration actions in 2020 and how does this dovetail with the other initiatives (e.g., the Customer Hub, community programs, and pilots).*

Discussion:

The Statewide LMI Portfolio presents an opportunity for the Program Administrators' investments to be aligned in a cohesive way to better address the needs of the LMI market segment and increase the impact of ratepayer funding. As a principle, the Program Administrators will not be administering conflicting or competitive offerings and are seeking to leverage the strengths of the Program Administrators in the implementation of programs and in outreach and engagement efforts. For example, in the affordable multifamily space, NYSERDA and multiple utilities offer incentive programs that can create confusion for market actors. As part of the redesign of the LMI programs, the Program Administrators will seek a streamlined approach for working in the affordable multifamily space, where the Utilities offer incentives for energy efficiency work and NYSERDA invests in technical assistance and other market development offerings.

---

<sup>18</sup> See, Implementation Plan, Sections 2 and 4.

Status:

For the balance of 2020, the Program Administrators will continue to offer the current program mix while program development occurs to incorporate the programs and funding into a cohesive-statewide approach for 1-4 family, multifamily and new construction initiatives, as well as in outreach and engagement. Modified programs, which will include more complementary offerings between the Program Administrators, will be rolled out in 2021.

## Eligibility

13. *The income guidelines for moderate income households should be a higher percentage than 80%. In particular, the cost of living for NYC households is much higher and 80% is not inclusive enough of all the households struggling to make ends meet. Was consideration given to modify program eligibility and raise the eligibility threshold up to 100% of median income?*

Discussion:

For the purposes of establishing categorical eligibility and creating consistency in the market where possible, the income thresholds used to determine eligibility for LMI initiatives are aligned with other state and federal energy and housing programs. The definition of “moderate-income” is a household income that is below 80% of the Area Median Income or State Median Income, whichever is greater, and aligns with federal Housing and Urban Development (“HUD”) definitions for eligibility for affordable housing. The eligibility criteria allow for the use of the Area Median Income which accounts for regional differences in cost of living.

Status:

The Implementation Plan defines the income eligibility thresholds for low- and moderate-income customers.<sup>19</sup> The Program Administrators will continue to align with State and federal energy and housing programs for income eligibility requirements. The Program Administrators are exploring a range of methods for verifying eligibility including traditional income verification through income documentation and eligibility proxies.

---

<sup>19</sup> See, Implementation Plan, Section 1.1.

14. *All incentives should be tiered by income beyond the traditional low- and moderate-income designations. Tiers should be at 15% or 20% intervals, as the difference in income of some making 40% of State Area Median Income versus 20% is profound and what each household can afford is different.*

Discussion:

In the Existing 1-4 Family Homes initiative, households that fall below 60% of state median income have 100% of their designated work scope covered. Households that fall between 60% to 80% of State or Area Median Income currently have to pay 50% of their work scope.

Status:

As part of the Transitional Phase, the Program Administrators are working through design updates to create a tiered incentive approach for 1-4 family households that fall between 60% and 80% of State or Area Median Income.

15. *Owners of residences in Housing Development Fund Corporation (“HDFC”) cooperatives and multifamily residential building properties should be deemed eligible as LMI customers based on documentation of loan closing, mortgage, HDFC incorporation, or deeds.*

Discussion:

Currently some programs offered by the Program Administrators accept eligibility proxies as a substitute to income verification.

Status:

The Program Administrators are exploring a range of methods for verifying eligibility including traditional income verification through income documentation and eligibility proxies.

16. *There are customers who own their own home and are not able to afford, for example, their mortgage and taxes. To defray costs, they have tenants. On their own, they would qualify for low-income energy efficiency programs but as a “household” collectively, their income exceeds low-income guidelines.*

Discussion:

For the purposes of establishing categorical eligibility and creating consistency in the market where possible, the income thresholds used to determine eligibility for LMI initiatives are aligned with other state and federal energy and housing

programs. This includes using household size as part of the eligibility requirements. The Program Administrators acknowledge the challenges associated with the income eligibility guidelines.

Status:

The Program Administrators will continue to align with State and federal energy and housing programs for income eligibility requirements. The Program Administrators are exploring a range of methods for verifying eligibility including traditional income verification through income documentation and eligibility proxies.

## Budgets, Benefits, and Performance Metrics.

### 17. *Discuss the Key Performance Indicators (“KPIs”) in the Implementation Plan.*

Discussion:

KPIs for the Statewide LMI Portfolio are shown in the Performance Metrics section of the Implementation Plan. Performance Metrics provide the basis for measuring performance and are therefore foundational to assessing the Statewide LMI Portfolio’s success, proving a roadmap for future evaluation and identifying areas for improvement. The Performance Metrics will be reviewed on a periodic basis and updated as appropriate to reflect Portfolio maturity.<sup>20</sup>

Status:

Performance Metrics are included in the LMI Implementation Plan and will be adjusted on an ongoing basis, based on DPS direction, Program Administrator program design finalization, and lessons learned during implementation. Stakeholders will have an opportunity to discuss and provide feedback on Performance Metric evolution, through stakeholder input sessions.

### 18. *Within financial incentives being offered, identify which types of “piggy backing” will be allowed and which will not be permitted.*

Discussion:

In 2016, the Clean Energy Advisory Council’s (“CEAC”) Clean Energy Implementation & Coordination Working Group developed and filed a Multiple

---

<sup>20</sup> Implementation Plan, Section 2.5

Incentives Recommendations Report to provide guidance regarding layered incentives.<sup>21</sup> This report is available on the PSC’s website and is in currently in effect.<sup>22</sup>

Status:

The Multiple Incentives Recommendations Report defines layered incentive criteria/principles and coordination requirements. LMI initiatives will comply with this guidance.

19. *The amount of funds dedicated to the LMI market segment should be proportional to the number of LMI households in NYS. NYSEDA's market characterization states that almost 50% of NYS Households are Low-income and yet, under NE: NY, only 20% of incremental funds are dedicated to LMI programs. Because LMI housing typically has higher energy usage and health and safety needs, more money needs to be invested to fix this.*

Discussion:

The Implementation Order allocated budgets through 2025. The Program Administrators acknowledge the market characterization of the State and will continue to work with all ratepayer funded programs to ensure coordinated implementation of programs to LMI customers.

Status:

This comment is beyond the scope and purview of the Statewide LMI Portfolio.

## Customer Awareness, Outreach & Engagement

20. *Describe the Customer Hub. Will there be a call center? When will initiatives and services be listed on the Customer Hub? How will customers without access to the internet learn about LMI initiatives and services?*

Discussion:

The Customer Hub, now known as the NY Energy Advisor, is a web-based tool and will contain consumer education and links to Program Administrators’ initiatives and services. The NY Energy Advisor website will not have a direct link to a call

---

<sup>21</sup> Matter 16-01007, *In the Matter of the CEAC’s Low- & Moderate-Income Clean Energy Initiatives Working Group*, Report on Alternative Approaches to Providing Low and Moderate Income (LMI) Clean Energy Services (filed February 3, 2017).

<sup>22</sup> See, CE-04 Multiple Incentive Guidance, <http://www3.dps.ny.gov/W/PSCWeb.nsf/ArticlesByTitle/255EA3546DF802B585257E38005460F9?OpenDocument>.

center as both NYSERDA and the Utilities currently have call centers with staff available to assist customers.

The NY Energy Advisor will be updated on a regular basis adding or changing initiatives and services. The website will provide navigation for residential customers and tenants, building owners, and service providers and will include opportunities for feedback within the site. Surveys may be used as one way to determine if the website is an effective tool in engaging customers to become more energy efficient. The NY Energy Advisor website will not replace the Clean Energy Dashboard but will provide a link to reference program progress.

As not all customers have access to the internet, information provided on the website will also be included in hard copy collateral materials, in multiple languages, to be distributed to community partners. The written materials will also list call center contact numbers.

Status:

NYSERDA is responsible for the oversight, development, and management of the NY Energy Advisor website. As new initiatives become available and more feedback is provided through participant surveys, updates will be incorporated.

21. *The Customer Hub (NY Energy Advisor website) should include real time monitoring of all program dollars spent by zip code, to match with the geo-eligibility pilot. This provides transparency on which communities are accessing funds in order to ensure equity in spending and access. It also allows implementers to be strategic when considering outreach strategies.*

Discussion:

The Climate Leadership and Community Protection Act (“CLCPA”) requires that clean energy investments made for LMI households and communities be tracked and reported by the Program Administrators.

Status:

The Program Administrators will work with DPS on the development of a process for tracking and reporting of investments for LMI households and communities, as required by the CLCPA. It is expected that this tracking and reporting will begin in 2021.

22. *There should be one common application for all programs within the same market sector (i.e., one application for multi-family programs, one application for programs targeted to customers in two to four-unit buildings, and one application for customers in single family homes).*

Discussion:

The Program Administrators acknowledge the necessity to design initiatives in a way that make it easy for LMI customers, affordable multifamily building owners and contractors to participate.

Status:

The Program Administrators will seek opportunities to develop streamlined enrollment into programs, including the use of single applications; however, the timeline for the development of necessary administrative infrastructure and systems will extend into 2021.

23. *Within New York City, the Program Administrator(s) should coordinate with the New York City Accelerator Program and New York City Mayor's Office of Sustainability on development of the Customer Hub (NY Energy Advisor website) to ensure programmatic elements are not replicated.*

Discussion:

The NY Energy Advisor website is being designed as a single point of entry for low- and moderate-income customers and affordable property owners to have access to all possible initiatives and services available to New Yorkers. The process for customers to find information should be seamless, avoiding customers having to search many websites and make multiple inquiries to ensure they have the best and only offer available.

Status:

The Program Administrators welcome the opportunity to work together with the NYC Mayor's Office of Sustainability to ensure it is clear to customers that program elements are not replicated.

24. *Program implementation/administrator consultants should have a mandate of 30-40% of partnerships with local CBOs and/or local Minority and Women Owned Business Enterprises ("MWBE"). "Local" should be defined as organizations located within 5-15 miles from designated targeted region and/or aligned with the CLCPA. A mandate of a*

*certain percentage of hiring of administrators, consultant and implementation program providers be local organizations should be considered. Program should not be farmed out to non-local companies who do not understand the dynamics of the LMI communities.*

Discussion:

Local insight is important when serving communities. Opportunities for involvement of local organizations may depend on the initiative, or the presence of organizations in a given community.

Status:

The Program Administrators will actively consider opportunities to improve the involvement of local organizations and/or MWBE in program design and or implementation.

25. *CBOs would like to be recognized for the value they bring to any programming and customer engagement. Less money should go to program administration and more should go to CBOs. CBOs that are not directly contracted, but are asked to support outreach efforts, should be paid for any promotional material they do of the programs. The Program Administrators should consider paying CBOs in the same way private consultants are paid.*

Discussion:

CBOs play an important role in providing information to their communities about incentives. While there are some programs such as the NYSERDA Community Energy Engagement Program, which leverages the reach of community-based organizations, there may be additional opportunities for the Program Administrators to work with and support CBOs.

Status:

As part of the Statewide LMI Portfolio development, the Program Administrators will consider how to best support and work with CBOs in the advancement of clean energy adoption across the state.

26. *The Program Administrators should spend more money on paid sponsorships for community events.*

Discussion:

It is recognized that community events are a way to engage LMI customers. Meeting with customers is a valuable way to build customer relationships and

awareness. The Program Administrators each invest in community event sponsorships.

Status:

The Program Administrators will continue to assess how to engage and support community events.

27. *Students of today will be adults and customers in the future. In order to address the State's energy efficiency goals, in-school energy efficiency initiatives directed at students should be considered. There are several in-school utility programs at this time however those offerings are not LMI specific and those programs fall outside of the scope of the LMI Portfolio. There may be a way, however, to use geotargeting and offer those initiatives to schools in LMI communities.*

Discussion:

Education and initiatives based in the school setting help ensure that children learn about the importance of energy efficiency and clean energy. The Program Administrators included school districts as potential community-based partners.<sup>23</sup> Energy efficiency school kits combined with lessons have been deployed successfully by Utilities. LMI schools may be identified, for example, by reviewing the percent of students in a school who receive the subsidized school lunch program. This type of initiative would need to include the ability for parents of students to opt in to minimize the distribution of unsolicited kits.

Status:

The Joint LMI Management Committee will evaluate the possibility of targeting in-school and adult education initiatives to low-income communities.

28. *The Program Administrator(s) should provide monthly online or in-person training opportunities for building owners on compiling the information for the audits and assessments. In-person training options are needed, as noted above, because some LMI customers have no or limited access to or familiarity with the internet.*

Discussion:

The Program Administrators agree on the value of webinars and in-person training series for multifamily building owners and property managers that show

---

<sup>23</sup> See, Implementation Plan, Section 5.4.

the financial benefits of participating in the LMI multifamily initiative, explain LMI eligibility requirements, and identify the simple steps they can take to apply for participation and prepare for audits and Flexible Technical Assistance (“FlexTech”) assessments. Such a service could drive awareness and applications for service very cost-effectively. NYSERDA plans to continue funding the FlexTech initiative, which provides direct support for building owners as a critical component of the multifamily offerings in the Statewide LMI Portfolio. As noted above, over the next 10 years, NYSERDA will also deliver education and training on energy efficiency and clean energy.

Status:

In the future, the Joint LMI Management Committee will review recommendations for specific building owner and property manager training, both online and in person, and work with the Program Administrators’ training initiative to incorporate such trainings into delivery of the Statewide Existing Affordable Multifamily Program.

29. *Consideration should be given to developing and maintaining “Community Blitz” strategies in several targeted neighborhoods.*

Discussion:

Two Utilities along with NYSERDA tested a neighborhood-based delivery model designed to improve energy affordability and increase access to clean energy solutions, energy education and energy management tools for LMI customers. This was accomplished by providing no-cost services to residential members of a defined geographic region and providing outreach and engagement through a fair-like event designed to bring together neighbors in a community to learn how to take action to become energy efficiency and enroll in available programs.

This pilot was aimed to determine if this engagement model would reduce administrative costs associated with program implementation and income verification.

Status:

Evaluation of this pilot is underway. If determined to be successful, the Program Administrators will aim to expand the reach of this pilot throughout the state and use the neighborhood-based delivery model as a mechanism to reach low- and

moderate-income customers in their communities, reduce administrative costs, and increase access to LMI and energy efficiency programs.<sup>24</sup>

## 1-4 Family Homes

30. *Are virtual audits being considered for the 1-4 family program?*

Discussion:

There are several reasons to consider remote or light touch audits, including efficiencies for building owners and contractors, and public health in light of the COVID-19 pandemic. The Program Administrators are currently exploring remote audits and assessments for the some of the ratepayer-funded programs that are being administered.

Status:

The Program Administrators will assess the use cases and potential for incorporation of remote audit practices and will incorporate where possible and practical.

31. *The 1-4 family initiatives should be more closely aligned with housing repair programs such as the Senior Citizen Homeowner Assistance Program, HomeFix, the Basement Apartment Conversion Pilot Program and more. Initiatives in the Portfolio should consider aligning with the Mayor's Office Sustainability's programs. For NYC's 1-4 family building program, these initiatives should be designed specifically to meet the needs of NYC households. For example, The EnergyFit program created by Pratt, should be adopted across NYC as another avenue beyond EmPower NY and Assisted Home Performance with ENERGY STAR® ("AHPwES") to increase the number of homes being retrofitted.*

Discussion:

The Program Administrators view the coordination of energy and housing programs as important to maximizing the impact of public resources and deliver the greatest outcome for residents. The Program Administrators will also be considering the design of programs like EmPower NY and AHPwES to incorporate packages of measures and improve the reach of the programs across the state.

Status:

---

<sup>24</sup> See, Implementation Plan, Section 5.3.3.

While the coordination of programs and resources is an ongoing effort, the Program Administrators will be exploring the coordination of programs and local resources, and making modifications to the EmPower NY and AHPwES programs in Q4 of 2020, with a rollout of modified approaches in 2021.

32. *For single family homes and two- to four-unit buildings, there should be opportunities for the homeowner or building owner(s) to self-install energy efficiency measures that do not require special expertise, or for which the owner is qualified (e.g., a building owner who is a licensed electrician should be permitted to install electrical upgrades). There also should be opportunities for such owners to engage in on-line auditing and streamlined documentation submissions.*

Discussion:

Generally, energy efficiency programs have favored having energy saving measures installed by qualified contractors to ensure the measures are installed correctly, operate safely and deliver the performance and energy bill savings that New York utility customers have invested in by funding the Portfolio. However, there are low-cost measures, such as those distributed in kits or plug-in appliances, that do not require special training or expertise; these may be installed by LMI customers. In addition, as technology progresses it is becoming increasingly possible for homeowners to perform basic online home energy assessments and virtual audits as a first step to participate in 1-4 family homes initiatives, as well as to assist in program qualify control inspections by capturing and submitting images and bar code scans of installed measures. Participating in remote activities such as these can reduce program delivery costs and minimize social contacts between customers and program administrators who otherwise need access to their homes in order to conduct the audits or field inspections.

Status:

The Program Administrators are exploring the use of online home energy assessments that provide a basic analysis of home energy use, recommendations on how to improve it, and provide a participation platform for customers who are interested in the recommendations. They are also exploring ways to use technology to reduce the number of in-person inspections that are conducted, in order to reduce costs and promote social distancing.

33. *Often decisions on energy appliances are made in a very short time frame when a quick replacement is needed. Many of the Implementation Plan strategies seem targeted at*

*decision made with the luxury of a long planning time. Are there efforts to get to the short-term decision making?*

Discussion:

While many of the programs have a long cycle time that doesn't necessarily help if a customer needs an emergency replacement of an energy appliance many Program Administrators have midstream and upstream energy appliance programs where customers or contractors can purchase an energy efficient appliance through a retail establishment, distributor or supply house with the incentive already included in the price of the appliance. The challenge with many of these programs is that the upfront cost of the energy efficient appliance, even with the incentive included, is a barrier for many LMI customers.

Status:

The Program Administrators will explore improving the process for the emergency replacement of energy appliances so that replacing a failed energy appliance in a true emergency can be prioritized. Additionally, the Program Administrators will explore whether it is feasible to make midstream and upstream energy efficient appliance programs through retailers, distributors, and supply houses more accessible to low-and moderate-income customers.

34. *Are manufactured homes eligible for EmPower NY services or AHPwES?*

Discussion:

The existing EmPower NY and AHPwES programs are available to residents of manufactured homes; however, older manufactured homes sometimes present challenges such as structural deficiencies that can prevent some energy efficiency work from being completed. The Program Administrators will also continue to explore opportunities for increasing energy efficiency of manufactured homes and addressing structural deficiencies, in coordination with housing agencies.

Status:

Manufactured homes are eligible to participate in existing programs.

## Multifamily

35. *Multifamily buildings often heat their buildings with oil heat, or dual fuel/interruptible. Will these buildings be eligible for incentives in the affordable multifamily initiative?*

Discussion:

The Statewide LMI Portfolio is delivered on a fuel neutral basis. The Program Administrators will conduct market studies to inform NYSERDA and other market actors about market, policy and institutional barriers, best practices across various building types, and strategies to maintain affordability while improving energy efficiency, all of which will inform pilot and demonstration efforts.

Status:

Through the Transitional Phase, the Program Administrators will examine additional eligible measures to encourage clean energy efficient upgrades of equipment.

36. *Are the Program Administrators evaluating the opportunity of work done at the measure level, whole-building level, and considering comprehensive/whole-building upgrades? In addition are they considering including a version of NYSERDA's Multifamily Performance Program's "4th incentive" – i.e., payment based upon energy savings and carbon reduction performance one year after project completion.?*

Discussion:

Through the Transitional Phase, the Program Administrators will be evaluating and considering multiple program design elements to reach the objectives of serving the affordable multifamily sector.

Status:

The Program Administrators will consider additional incentive designs to encourage broader work scopes and higher energy savings, while also supporting buildings that are not ready to undertake more comprehensive work scopes.

37. *Given the complexity of serving the LMI population in multifamily housing where some or all utilities may be included in rent, great care should be taken with the metric (e.g., perhaps by looking at the overall rent and utility burden). Ensure that displacement of costs from the central common area meter(s) are not rewarded or incentivized (e.g., costs of central heat or domestic hot water should not be transferred to the tenant's electric bill as a result of heat pump installation placed on the apartment's electric load and meter without a rent reduction).*

Discussion:

Energy costs for tenants that do not pay directly for energy are still borne by tenants in the form of rent. This was the primary consideration by the Commission when approving affordable multifamily energy efficiency programs in the beginning of the System Benefits Charge programs. While the incentives go to the building owner, the intention is that by reducing overall energy consumption for the building and operating costs for the building owner, the programs would enable the preservation of affordable rents.

It is difficult to make a direct correlation to building energy consumption, operating costs, and tenant rent that would apply to all housing configurations, and in some cases, housing policies subsidize or otherwise influence the rent level. However, for ratepayer-funded programs, requirements prevent property owners from increasing rents in association with any work that is incentivized through the programs. Energy cost burden is included as a Performance Metric for tracking the Statewide LMI Portfolio's progress to goals.

Status:

The Program Administrators will assess additional program design and policy considerations to reduce the potential for tenants from being negatively affected by an energy efficiency upgrade in their building.

38. *What plans do you have to address helping tenants with unresponsive out of state landlords?*

Discussion:

The "split incentive" challenge has continued to be an ongoing barrier to reaching customers with energy efficiency. Often, if the tenant is paying the energy bill the landlord has no incentive to invest in or approve energy efficiency upgrades and the tenant often must get permission from the landlord to make any changes to their property. Conversely, if the landlord is paying the energy bill, the tenant often does not have much incentive to participate in energy efficiency upgrades or energy saving behaviors. Tenants in 1-4 family homes can apply for the current EmPower NY program and receive no-cost in-unit measures if those measures do not require approval from their landlord. The challenge remains for tenants in multifamily buildings due to the current multifamily programs in the market requiring that the landlord or building owner be the applicant to the program.

Status:

The Program Administrators will explore improving outreach and education strategies to both landlords and tenants to demonstrate the energy and monetary benefits of participating in the program to encourage the landlords to apply and to provide tenants with the resources to talk to their landlords about applying or granting permission for the tenant to apply and receive home upgrades. The Program Administrators can explore whether it is feasible to have tenants who are interested in participating in energy efficiency programs to refer their landlord to the program.

## Affordable New Construction

39. *Will there be a net zero goal for new construction include embodied carbon? Are you considering zero energy modular homes as factory-built solutions for the LMI sector?*

### Discussion:

High performance new construction can significantly reduce the energy consumption in the residential sector. It can also: deliver energy bill savings for residents and building owners, improve the health and comfort of residents, provide resilient and sustainable housing stock, and deliver long term energy savings and carbon emission reductions. Zero energy modular homes offer an alternative to traditional stick-built homes that can be less expensive and appropriate as replacement for traditional manufactured housing, as well as urban infill. In its Strategic Outlook for 2020-2023,<sup>25</sup> NYSERDA identified the development of the market for zero energy modular new construction as a priority and will be pursuing this through a combination of incentives and market development support for manufacturers and housing intermediaries. Embodied carbon is currently not something that is factored into new construction program design but will be explored over the next year.

### Status:

A path for zero energy modular new construction will be incorporated into the affordable new construction initiatives in 2021.

## Workforce Development

40. *Direct funding and support should be provided to affordable housing agencies to train project management, development, and engineering staff on how to identify and scope*

---

<sup>25</sup> See, Strategic Outlook for 2020-2023 <https://www.nyserdera.ny.gov/-/media/Files/About/Strategic-Plan/strategic-outlook.pdf>.

*opportunities for greenhouse gas emissions reduction projects and satisfy program eligibility requirements.*

Discussion:

Supporting capacity building within housing agencies to advance building performance of affordable housing will be an important complement to the incentives for improving the energy efficiency of buildings. NYSERDA will seek to build on the work done with housing agencies and intermediaries to train housing agency staff on the Integrated Physical Needs Assessment, to address other potential technical training or support needed by the housing agencies.

Status:

Under the Statewide LMI Portfolio, the Program Administrators will work with housing agencies to identify the needs and assess opportunities for technical support.

## Beneficial Electrification

41. *With respect to energy efficiency initiatives and electric load, some energy efficiency options may increase electricity use during some parts of the year but decrease in other times of the year. An example is ground source heat pumps. Some may misinterpret the idea of electric load reduction to not consider heat pumps.*

Discussion:

The emphasis of electrification initiatives will be on devising solutions to help and maintain long-term bill affordability. As part of the Existing Affordable Multifamily, Existing 1-4 Family Homes, and Affordable New Construction initiatives, there is an emphasis on building performance and comprehensive energy upgrades (i.e., looking at heating systems and ensuring the building envelope is efficient and able to reduce thermal load by improving shell of building/home).

There is an expectation that with electrification there will be a shift in heating load to electric, so it is likely to see increased electric load for customers adopting heat pumps. Cooling is a factor as well. While looking into use cases for heat pumps, the Program Administrators will also need to ensure that buildings are being made as efficient as possible, to reduce base load as much as possible. This program design will go hand in hand with heat pump installations.

Status:

NYSERDA's \$30 million<sup>26</sup> investment in beneficial electrification through the CEF is slated to examine four LMI beneficial electrification categories: research and analysis, pilots and demonstrations, short-term incentives, and consumer education. Results from that investment will be used to influence further LMI beneficial electrification initiatives and services.

42. *Stakeholders expressed concern that heat pump adoption will not happen without more robust incentives. There needs to be ways to provide incentives for the adoption heat pump measures. Any incremental costs for switching out boilers to air source heat pumps above and beyond what the same boiler would cost an LMI household should be paid for by incentives.*

Discussion:

For many LMI households, the replacement of heating systems requires deep or full subsidy, whether it is a traditional boiler or furnace, or heat pump. In the design of electrification programs, the Program Administrators will consider the level of subsidy that is necessary to enable installation. Considerations and approach in deploying heat pumps will vary based on application. For instance, heat pumps in affordable multifamily buildings will require considerations that may be different than when installing heat pumps in a single-family home. Consideration of existing HVAC configuration, displaced fuel, possible negative impact on customer utility bills, and occupant/building operator education is necessary to ensure effective and cost-effective deployment of heat pumps in this sector. In addition, envelope and other energy efficiency improvements will be necessary to ensure the optimal performance of the heat pump. The \$30 million investment in beneficial electrification for the LMI market segment by NYSERDA will inform policy and program design, including incentive levels.

Status:

Through 2021, the Program Administrators will conduct research and analysis, and pilot and demonstrate clean heating and cooling solutions in NYS to inform long term program and incentive design to support the installation of heat pumps for LMI customers and affordable buildings.

---

<sup>26</sup> As noted above, in addition to the \$30 million investment in beneficial electrification represented here, NYSERDA is investing an additional \$1 million as part of this work under the CEF.

## Coordination with External Stakeholders

43. *The Program Administrators, responsible for the LMI energy efficiency program design and delivery, should coordinate with the Weatherization Assistance Program to provide comprehensive assistance to LMI customers while lowering costs and reducing administrative burden.*

Discussion:

NYSERDA works with New York State Homes and Community Renewal (“HCR”) and WAP as part of the Low-Income Energy Task Force to better align WAP and the ratepayer funded LMI programs, such as EmPower NY. In addition, WAP subgrantees may provide services under EmPower NY and other LMI energy efficiency programs, which would allow the subgrantees to better coordinate funding for their clients.

Status:

The alignment of WAP and the ratepayer funded initiatives will continue through the Low-Income Energy Task Force, and the Program Administrators will continue to work with HCR and WAP subgrantees on opportunities to improve coordination.

44. *As needed, bring NYS HCR and the DPS into the development of policies for building electrification similar to those developed for tenant protections when a master metered multifamily building is converted into a sub-metered building where tenants become responsible for in-unit electric use*

Discussion:

NYSERDA coordinates with HCR and DPS as part of the Low-Income Energy Task Force, and both agencies have and will continue to be engaged in the development of approaches for electrification in the LMI market segment. Further, NYSERDA has and will continue to engage with stakeholders and consumer advocates to identify potential risks for low-income customers.

Status:

The Program Administrators will continue to engage with HCR, DPS, and other relevant organizations on the design and implementation of policies and programs to support building electrification in the LMI market segment.

45. *The Program Administrators should explore and implement opportunities for the energy efficiency programs for 1-4 family homes and buildings to be combined with funding with other affordable housing programs.*

Discussion:

The Program Administrators will consider all opportunities for coordinating and leveraging other funding sources and programs to increase the overall impact of the ratepayer-funded initiatives. Many participating contractors and customers currently combine and coordinate energy efficiency programs with local housing programs. In addition, the Community Energy Engagement Program administered by NYSERDA helps to coordinate resources at the local level.

Status:

During the course of program design and implementation, the Program Administrators will continue to explore opportunities to improve coordination at the local level.

## COVID-19

46. *As the effects of COVID-19 evolve and become more apparent, there is broad consensus that there will be negative impact on both LMI community members and the organizations that serve them. While the LMI Implementation Plan is not intended as a COVID-19 response plan, ignoring the effects of the pandemic would not be in line with the overall intent of LMI programs.*

Discussion:

The Program Administrators acknowledge that the number of income-eligible or customers in-need will likely increase due to COVID-19. Many New Yorkers who had not faced a financial crisis in the past are now in need. Further, communities with lower-income residents are facing disproportionate impacts.

Status:

Through the design of initiatives under the Statewide LMI Portfolio, the Program Administrators will continue to explore opportunities to address the impacts of COVID-19 on LMI communities and the organizations that serve them.

47. *Communities hard hit by unemployment and COVID-19 could serve as test cases for quick intervention to provide energy efficiency measures to increase affordability, health and safety.*

Discussion:

The Program Administrators will explore options for serving households and communities facing impacts of the economic downturn as a result of COVID-19.

Status:

Opportunities for addressing the needs of communities and households post-COVID-19 will be an ongoing consideration for the Program Administrators.

48. *We recommend program designs that target customers who are at risk of arrearages or shutoffs post-COVID for energy efficiency services.*

Discussion:

Utilities currently prioritize and refer low-income customers with high arrears and potentially facing shutoffs for energy efficiency services under EmPower NY. The Program Administrators will continue to explore opportunities to reach customers that are at risk of arrearages or shutoffs.

Status:

As 2020 progresses, the Program Administrators will work with stakeholders, external administrators of energy efficiency programs and communities to adapt initiatives in light of COVID-19 and the resulting economic conditions.

## Pilots

49. *What is the process the Program Administrators are using to define who is LMI and where they are located? Considerations should be given to using geographic targeting, with automatic eligibility for buildings: HUD census tract, Neighborhood dev areas (DYCD), in/out criteria coupled with an in/out qualifying criteria. For example, "out" if built after 2010 unless the building was built as an affordable housing project requiring at least 60% of the units to meet 80% of Area Median Income criteria.*

Discussion:

Traditional LMI programs determine the income eligibility of participants through income screening or determination of categorical eligibility. The Program Administrators will incorporate additional approaches for determining eligibility as part of the Portfolio, including working with community and retail partners that

typically service lower-income communities, as well as incorporating a geo-based eligibility model. In addition, the Program Administrators are considering geo-based eligibility as a means of streamlining and reducing administrative cost and burden, as well as improving the outreach and participation among residents in communities that have historically been underserved. NYSERDA will launch a geo-eligibility pilot during the summer of 2020 to test the implementation process, including the potential for reduced administrative burden; level of uptake; and impact on contractor business models. This initial pilot seeks to determine alternate approaches for determining eligibility for single family homes. The pilot will be conducted in Monroe County and the Capital District, with considerations for applicability statewide.

Status:

The Program Administrators will evaluate the initial geo-eligibility pilot and assess the application of this approach to other program types.

50. *Will RFPs be released for LMI pilots?*

Discussion:

The testing or demonstrating service delivery models or technologies will occur through multiple approaches in the Portfolio. In some cases, it will be possible to test approaches within existing programs, and in other cases a standalone pilot or demonstration will be necessary. The Implementation Plan provides an overview of the objectives of pilots in the Portfolio.

Status:

If a pilot opportunity is released as a competitive solicitation, it will be posted to the NYSERDA website and announced to parties that are on the NYSERDA funding opportunities Listserv. The list of NYSERDA funding opportunities, PONs, RFPs, RFQs are listed at <https://www.nyserda.ny.gov/Funding-Opportunities/>.

## Benefit Cost Analysis

51. *Addressing the inadequacies of the BCA accounting for non-energy benefits (“NEBs”) is an important issue and should be addressed. BCA Cost Analysis does not adequately account for non-energy benefits, which can often be significant for LMI households (e.g. comfort, indoor air quality) even if bills do not decline significantly.*

Discussion:

The Program Administrators are required to conduct BCA analysis in accordance with the BCA guidance, provided by DPS Staff. With respect to the Statewide LMI Portfolio, the Program Administrators have included Performance Metrics outside of the BCA to track impacts beyond the BCA analysis.

Status: The Program Administrators will conduct BCA analysis in accordance with the guidance provided by DPS.

## Contractors

52. *Qualifying to serve the multifamily market should be automatic qualification to serve the one-to-four-unit market sector (or vice versa) to ensure program success driven by customer satisfaction and the realization of program. There should be a single process for contractors to become qualified to serve multiple market sectors and multiple administrators. Once a contractor qualifies for a utility's multi-family programs, the contractor should be deemed qualified for NYSERDA multi-family programs; similarly, once a contractor meets the requirements for multi-family projects, the contractor should be deemed qualified for less complex two- to four-unit buildings and single family homes).*

Discussion:

The Program Administrators agree with the objective to harmonize and streamline contractor qualifications for participation across all initiatives, as this would streamline participation and reduce administrative burden for contractors participating across multiple utility territories. The qualification of contractors for working in multifamily buildings or individual homes will be based on industry standards and demonstration of skill and experience working in those building types, as currently is the case in utility and NYSERDA-administered programs.

Status:

The review and harmonization of program contractor participation requirements will fall under the purview of the Joint LMI Management Committee and will be incorporated into the redesigned program offerings in 2021.

53. *Contractor support is critical to ensuring that projects are completed timely and cost-effectively. The documentation requirements imposed on contractors by NYSERDA and the Utilities seem to have increased and become more burdensome recently. NYSERDA and the Utilities should review and reevaluate the requirements to reduce the burdens and*

*streamline the effort. Additionally, the Portfolio Administrator(s) should provide locally based contractor advisory services and technical support to ensure that small, local contractors are able to serve LMI customers and are kept apprised of program changes.*

Discussion:

Program requirements vary by the nature of the program and by administrator. However, the Program Administrators agree with the notion that program and administrative requirements should be streamlined, and contractors should be supported with process and technical support where necessary.

Status:

In designing programs, the Program Administrators will explore opportunities to increase support for contractors, while also streamlining program participation requirements.

54. *The Program Administrators should develop infrastructure to provide support to contractors through all stages of the program process, from qualification to job completion to documentation submission. This infrastructure should include a fully staffed support desk, newsletters or electronic posting of new developments, and periodic (e.g., monthly or quarterly) meetings to inform contractors on evolving technologies, best practices, program process changes, incentive updates, and other salient information.*

Discussion:

The Program Administrators agree that contractors participating in the LMI multifamily and small homes programs should have comprehensive administrative process and technical support, within budgetary constraints, including a program implementer's staff resource that is highly responsive in providing on-demand administrative and technical support. In fact, programs such as EmPower NY and AHPwES currently provide technical support and training to participating contractors. It is important to support and engage contractors to continuously improve delivery and participating contractor and customer satisfaction.

Status:

As programs are developed and modified under the Statewide LMI Portfolio, the Program Administrators will seek opportunities to incorporate contractor support in the various programs that are administered.

55. *The information on contractors available through NYSEERDA and the Utilities should include MWBE certifications, area(s) served, and be representative of program participants. This information should be provided in multiple languages to maximize opportunities for customers who are not proficient in English. Additionally, to the extent that contractors are multilingual, it could be very helpful to provide that information to facilitate communications between contractors and customers.*

Discussion:

The Program Administrators recognize the value of engagement with MWBE businesses that work within LMI communities and understand local customer needs and customs, including language. This will increase the reach of the Portfolio into the hardest-to-reach communities.

Status:

Over the course of 2020, the Program Administrators will work with stakeholders and community partners to identify and recruit MWBE businesses to participate in LMI programs. In addition, the Administrators will consider how best to communicate contractor characteristics to customers and program participants.

56. *The Program Administrators should develop a platform where customers can engage with other customers on contractor experiences and recommendations.*

Discussion:

The Program Administrators appreciate the idea of providing customers with a platform for providing public feedback on their experiences with contractors. The Program Administrators recognize that there are several considerations for developing and implementing a platform, including the design of programs, the role of contractors, and the necessary administrative support necessary for the platform.

Status:

The LMI will evolve over time and the Joint LMI Management Committee will consider how to incorporate customer feedback as part of the Portfolio of initiatives, including the potential for inclusion on the NY Energy Advisor website.