

Statewide Low- to Moderate-Income Joint Management Committee Coordination Plan

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Case 18-M-0084
Case 14-M-0094

Contents

1. Introduction.....	1
2. Data Sharing between Utilities and NYSERDA.....	2
2.1 Context and Approach	2
2.2 Types of Customer Data and Identified Topics for Assessment	3
2.3 Timeline	5
3. Evaluation, Measurement, and Verification	5
3.1 Context and Approach	5
3.2 Timeline	6
4. Implementation Contractor Procurement.....	6
4.1 Context and Approach	6
4.2 Considerations.....	7
4.2.1 Design of Integrated Portfolio.....	7
4.2.2 Assessment of Costs and Benefits.....	8
4.3 Timeline	8
5. Marketing	8
5.1 Context and Approach	8
5.2 Considerations.....	9
5.3 Timeline	10
6. Single Application Process.....	10
6.1 Context and Approach	10
6.2 Considerations.....	11
6.3 Timeline	11

1. Introduction

Pursuant to the January 16, 2020 *Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios through 2025* (“Implementation Order”),¹ the New York State Energy Research and Development Authority (“NYSERDA”) and the New York Utilities² (“Utilities”) (collectively, “Program Administrators”) jointly filed an Implementation Plan on July 24, 2020 for the Statewide Low-to Moderate-Income (“LMI”) Portfolio (“Implementation Plan”). The Implementation Plan describes the common statewide framework which the Program Administrators are implementing to advance energy affordability for LMI customers in the State of New York.

The Implementation Plan created the Statewide LMI Portfolio (“LMI Portfolio”) to align efforts by the Program Administrators to enhance LMI customers’ access to energy efficiency, as one element to address comprehensive energy affordability. The Implementation Plan outlines a set of initiatives and opportunities for alignment amongst the Program Administrators, that can increase the impact of ratepayer funding, reduce administrative costs, and provide a consistent and efficient method for LMI customers and affordable building owners to access initiatives and services.

As noted by the Program Administrators in the Implementation Plan³ and recognized by New York State Department of Public Service Staff (“DPS Staff”) in the letter approving the Implementation Plan,⁴ there will be a transition period from the current state of initiatives to full

¹ 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 (“Implementation Order”) (issued January 16, 2020).

² Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; KeySpan Gas East Corporation d/b/a National Grid, The Brooklyn Union Gas Company d/b/a National Grid NY, Niagara Mohawk Power Corporation d/b/a National Grid; National Fuel Gas Distribution Corporation; New York State Electric & Gas Corporation; Orange and Rockland Utilities, Inc.; and Rochester Gas and Electric Corporation (collectively, “Utilities”).

³ NE: NY Proceeding, Implementation Plan, p. 8.

⁴ NE: NY Proceeding, “Statewide LMI Implementation Plan Approval Letter,” (Filed September 14, 2020), p. 2.

initiative implementation, and the Program Administrators will address certain complex elements as part of this transition. Key elements of that transition include: (1) data sharing between the Program Administrators; (2) evaluation, measurement and verification (“EM&V”); (3) implementation contractor procurement; (4) marketing; and (5) the development and use of single applications across Program Administrators, where applicable. Strong coordination across these components will be important to the successful implementation of the Implementation Plan. This Coordination Plan outlines in detail the Program Administrators’ proposal for when and how each of these elements will be resolved and solutions implemented.

2. Data Sharing between Utilities and NYSERDA

2.1 Context and Approach

Efficient sharing of data between the Utilities and NYSERDA is a vital component of achieving the goals and objectives described in the Implementation Plan. Such sharing must, however, balance the improved customer experience and streamlined administration of programs, with the need for diligence in rules, processes, and systems that protect customer privacy and security consistent with Public Service Commission (“Commission”) and Program Administrator policies, laws and regulations. To appropriately address and advance data sharing needs and opportunities for the Portfolio, the Program Administrators have undertaken the following approach:

- Identification of the data sharing needs for the Portfolio through the development of “use cases,” *i.e.*, concise descriptions of the purposes and functions for which particular data is required and the benefit to the customer;
- Development of a comprehensive understanding of the existing data sharing framework that is already in place. This data framework reflects determinations from Commission

- proceedings and orders⁵ and includes established policies and principles, mutual agreements (e.g., Memoranda of Understanding (“MOUs”) between utilities and NYSERDA, as well as agreements with third party providers), and effective practices, including processes and systems that enable the secure exchange of data. The Program Administrators are currently in the process of developing a common understanding of existing data sharing policies, processes, systems, and agreements;
- Determination of whether any gaps exist between data needs for the Portfolio and the existing data sharing framework; and
 - Identification and implementation of solutions to address any gaps that are identified.

In parallel to addressing data sharing, the Program Administrators are also advancing other elements of the Portfolio, including program design for the initiatives. There are interdependencies between data sharing and such program elements; accordingly, the continued evolution and alignment of program design may lead to changes to data sharing needs and protocols. Therefore, the process of assessing and addressing data sharing will be iterative and will continue to evolve over the course of the Implementation Plan period (*i.e.*, through 2025).

2.2 Types of Customer Data and Identified Topics for Assessment

Effectively addressing data sharing between the Utilities and NYSERDA requires the recognition of distinctions among the different types of customer data, including (1) whether customer data is for a program participant or non-participant; and (2) whether data is customer-specific or non-customer-specific, *i.e.*, whether data has been aggregated and/or anonymized. Pursuant to existing policies and Commission directives, once the need for the data sharing is established, data sharing can readily occur if it fits one of two criteria: (1) the customer has provided consent

⁵ *E.g.*, CASE 14-M-0094 - *Proceeding on Motion of the Commission to Consider a Clean Energy Fund (“CEF Proceeding”), Order Regarding New York State Energy Research And Development Authority Data Access And Legacy Reporting (“CEF Data Order”)* (Issued January 17, 2019); CEF Proceeding, *Order Authorizing the Clean Energy Fund Framework* (Issued January 21, 2016), p. 28.

for their data to be shared with the specified entity(ies); or (2) the desired data is anonymized and non-customer-specific, consistent with the Commission’s aggregated data standards.⁶

The Program Administrators do not envision obstacles regarding sharing of participant data between the Utilities and NYSERDA, given the requirement for participants to consent.

Similarly, the Program Administrators are able to share aggregated, anonymized, non-customer-specific data, including both participants’ and non-participants’ data , if there is consistency with approved policies, including those established in Commission Orders and guidance documents.⁷

Beyond the two categories where data sharing may readily occur, the Program Administrators will collaborate to minimize the necessary sharing of non-anonymized, non-participant customer data. In cases for which sharing of non-anonymized non-participant data is necessary, the Utilities and NYSERDA will follow the data sharing protocols described in the CEF Data Order⁸ and corresponding utility-specific Data Security MOU, and no such data will be shared if prohibited by any privacy laws.

Beyond the regulatory policy described above regarding data sharing, the Program Administrators are also reviewing current legal agreements and program materials, to determine if modifications are needed. For example, the Program Administrators have identified that revisions may be needed to “consent language” that participants in Portfolio programs are required to sign, which provides consent that their data may be shared between their utility or utilities and NYSERDA for specific program purposes. The Program Administrators are in the process of sharing proposed consent language with each other, to assess whether revisions are needed to provide for additional data needs or data sharing and to ensure that customers are clearly informed of how their data may be shared.

⁷ E.g., DSIP Proceeding, DSIP Order (issued March 9, 2017); and DSIP Proceeding, Whole Building Data Aggregation Order (issued April 20, 2018).

⁸ CEF Proceeding, CEF Data Order.

Similarly, the Program Administrators are assessing whether amendments may be needed to existing data-sharing MOUs governing utility and NYSERDA data sharing. The Program Administrators are currently examining MOU documents for this purpose.

Finally, the Program Administrators recognize that data sharing between the Utilities and NYSERDA has been of significant focus to date, but that data sharing among Utilities may be warranted given the Statewide Portfolio approach. The Program Administrators will continue to assess and address, as appropriate, data sharing needs and processes between the Utilities.

2.3 Timeline

By the end of Q1 2021, the Utilities and NYSERDA will identify situations in which consent language will be needed and will update consent language in relevant applications. As program design continues into 2021, the Utilities and NYSERDA will continue to identify data sharing needs and will address those needs as appropriate.

3. Evaluation, Measurement, and Verification

3.1 Context and Approach

The Implementation Plan outlined the coordinated approach the Program Administrators will take to estimate savings and evaluate LMI initiatives. The Implementation Plan stated that specific initiative-level savings estimation approaches and evaluation schedules will be detailed in forthcoming Verified Gross Savings (“VGS”) Specifications. The Program Administrators have been coordinating and developing LMI VGS Specifications that will be filed December 13, 2020.

VGS Specifications will be filed for all initiatives that have been identified in the Implementation Plan. The VGS Specifications will discuss each identified initiative and its respective evaluation approach and timeline, as well as broader statewide evaluation collaboration per initiative. The following VGS Specifications will be filed December 13, 2020:

- *Existing 1-4 Family Homes*
- *Existing Affordable Multifamily Buildings*
- *Affordable New Construction*

- *Additional LMI Initiatives*

A VGS Specification for the *Pilots and Demonstrations* Initiative will be developed when the initiative goes to market. The VGS Specification for the NYS Clean Heat Program will be updated to include the *Beneficial Electrification in Low- and Moderate-Income Homes* initiative and will be in line with the next iteration of the Clean Heat Implementation Plan.

3.2 Timeline

The timeline shown in the following table identifies the Program Administrators' current projection of identified milestones and associated target dates.

2020	<ul style="list-style-type: none">• LMI VGS Specifications for all initiatives that have been identified in the Implementation Plan will be filed by December 13, 2020• Program Administrators will determine needed meeting frequency and develop a schedule for continued EM&V collaboration discussions
2021	<ul style="list-style-type: none">• A standardized series of survey questions will be developed for statewide use when conducting process evaluation research throughout 2021• Statewide and regional average existing condition baselines will be developed, facilitated through the TRM Management Committee, with key LMI measures identified for further research by Q3 2021
2023	<ul style="list-style-type: none">• Alignment will be achieved on impact evaluation methods and/or joint procurement processes, within budgetary constraints, to ensure comparability across statewide programming by Q1 2023

4. Implementation Contractor Procurement

4.1 Context and Approach

Administrative efficiency and achieving the greatest impact for customer funds are among the primary objectives of the Statewide LMI Portfolio. Program Administrators currently use implementation contractors ("IC") to fulfill administrative functions such as application intake, project review and approval, processing of incentives, trade ally management, and quality control and assurance. Each Program Administrator currently contracts for implementation support for the various initiatives that are being administered; there are several ICs currently supporting the utility and NYSERDA administered LMI initiatives. With the development of a

more integrated set of initiatives between the Utilities and NYSERDA, there is the potential to assess the role of ICs to achieve economies of scale and reduce overall administrative costs within the LMI Portfolio. In addition, restructuring the use of ICs within the Portfolio has the potential to help streamline initiative participation by customers. This can be accomplished by consolidating the intake and facilitating the use of a single application, thereby making it easier for customer information to be shared across Program Administrators. As discussed below, the Program Administrators will fully assess options to best utilize ICs.

4.2 Considerations

When assessing the opportunities for improving administrative efficiencies within the LMI Portfolio, the Program Administrators will need to consider the scope and terms associated with existing implementation contracts, instances where Program Administrators leverage the same IC to support both market rate and LMI initiatives, the design of the new initiatives, contract modifications flexibility for future initiative needs, and assessment of the relative costs between the current model of multiple ICs and a streamlined approach.

For example, Program Administrators currently have different implementation models and IC contract terms for existing affordable multifamily initiatives. The streamlining of ICs within a single initiative across Program Administrators will require the alignment of the end dates of existing implementation contracts, as well as the RFP schedule for implementation support. Some Program Administrators also leverage the same IC to administer both the market rate and LMI components of their multifamily program. Consideration is necessary to understand the implications that changing this approach may have on Program Administrators that have been able to achieve administrative efficiencies within their own portfolio.

4.2.1 Design of Integrated Portfolio

With the goal of developing a consistent statewide approach for LMI initiatives, the Program Administrators will consider program design elements, including implementation. For instances where the Program Administrators will leverage an existing program, such as EmPower New York (“EmPower NY”), where a single implementation contractor exists, the Program Administrators may continue with this model. However, in the case of designing new initiatives, such as in the

affordable multifamily sector, the Program Administrators will need to develop complementary initiatives, and the nature of the IC will depend on the type of initiative(s) being considered and how those initiatives interact. During the 2020 transition phase, the Program Administrators will develop the models for the complementary offerings and will identify implementation needs as part of that work.

4.2.2 Assessment of Costs and Benefits

In considering the role of ICs in the LMI Portfolio, Program Administrators will assess the relative implementation needs and costs of implementation services for each initiative area and for multiple scenarios including (1) a single IC across all Program Administrators for a given initiative area; and (2) multiple ICs for the initiative area. The assessment of costs and benefits will need to be weighed against the benefits of streamlining the ICs, including benefits to customers, and participating vendors.

4.3 Timeline

To date, the Program Administrators have established that for the 1-4 family homes initiatives (EmPower NY), the Program Administrators will leverage one IC. The Program Administrators are investigating implementation needs for each of the other initiative areas based on the program design work underway.

2021	<ul style="list-style-type: none">• Assess scope and term of ICs by Program Administrator• Determine role of IC as part of program design• Assess cost/benefit of IC scenarios by initiative type• Plan for alignment of ICs end of 2021 (including aligning solicitations and contract end dates, where applicable)• Implement the developed plan for alignment of ICs where applicable
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5. Marketing

5.1 Context and Approach

A solid marketing and outreach approach is needed so that LMI customers and affordable multifamily property owners are aware of initiatives and services available to them. A

comprehensive statewide brand will be developed to maximize exposure of the LMI Portfolio initiatives. The LMI Portfolio will also depend on localized marketing implemented by each utility in its respective territories. Marketing efforts will consist of a combination of statewide and localized marketing. The LMI Joint Management Committee (“LMI JMC”) established a work stream to oversee and provide input on the development and launch of the New York Energy Advisor (“NY Energy Advisor”) and collateral materials.

Given that customer confusion has been identified as a key barrier to adoption, the NY Energy Advisor, a web-based customer hub, will act as a single location to provide a clear and easy way for LMI customers to access information on relevant LMI initiatives and services (*e.g.*, utility, NYSERDA, and Home Energy Assistant Program (“ HEAP”)). An interim NY Energy Advisor website was created and launched in Q3 2020 while the full NY Energy Advisor is currently being developed. This interim website provides customers and affordable property owners with basic information and links to websites that describe current offerings of each of the participating Utilities, NYSERDA, HEAP and Weatherization Assistance Program (“WAP”). Customers visiting the interim website can leave their contact information to be notified with a link to the full website once it is launched.

5.2 Considerations

The LMI JMC marketing work stream is responsible for reviewing and providing input on marketing, advertising, and collateral materials. NYSERDA will lead the development of all statewide marketing materials and the NY Energy Advisor website, and the Utilities will be engaged throughout for feedback, reviews, and approvals.

NYSERDA is also in the process of developing a foundational strategy document, followed by a marketing plan, which will be presented to the LMI JMC work stream. Capitalizing on the expertise of the members of the work stream, input will be sought and evaluated for the strategic marketing document and subsequent marketing plans.

An overarching marketing agreement between the Utilities and NYSERDA is still in the process of being drafted. The agreement will include the Scope of Work establishing criteria for the NY Energy Advisor statewide branded marketing and advertising initiatives and the

necessary cost sharing agreement between NYSERDA and the Utilities.

5.3 Timeline

Milestones for marketing of NY Energy Advisor, statewide branding, and collateral materials are shown in the table below. These milestones will be monitored and updated as necessary.

2020	<ul style="list-style-type: none">• Launch New York Energy Advisor interim page (completed)• Align the roles of statewide and local marketing; ways that Program Administrators will collaborate - Q4• Design collateral materials templates - Q4
2021	<ul style="list-style-type: none">• Develop a statewide brand - Q1• Complete a pre- website baseline survey - Q1• Develop marketing strategy for 2021 – Q1• Finalize joint marketing scope of work Q1• Launch NY Energy Advisor full website – Q1• Develop and circulate statewide branded collateral materials. Available at the same time as the marketing campaign launch - Q1• Implement statewide marketing strategy - Q1-Q2• Evaluate effectiveness of marketing campaign - Q3• Refresh marketing and advertising campaign based on results - Q4

6. Single Application Process

In creating the Statewide LMI Portfolio, the Program Administrators identified the importance of assessing the application process for participants in initiatives. Feedback from customers, market actors, and other stakeholders confirmed the need to simplify and streamline the application process.

6.1 Context and Approach

Stakeholders have commented that a single or streamlined application process would help to reduce the administrative burden on customers and make it easier to participate in initiatives, increasing the likelihood that customers will participate. The current state of program administration in some instances involves multiple initiatives targeting the same market segment, requiring additional work on the part of customers to either fill out multiple

applications or to take the time to discern the differences among initiatives and ultimately decide which initiatives to seek. As the LMI Portfolio evolves and transitions from duplicative initiatives in some market segments to complementary initiatives, the Program Administrators will need to assess the customer journey for customers that are participating in complementary offering. Customers may be providing much of the same information on different program applications; therefore, the ability of a customer to fill out the information once and have the Program Administrators direct it to the right place can significantly improve customer experience. Currently, the 1-4 family home market is utilizing one application across the state for the EmPower NY program.

6.2 Considerations

To achieve these goals, the Program Administrators will create a page on the NY Energy Advisor website with guides that will explain to participants how to enroll and submit their applications following their respective Program Administrator's directions. The NY Energy Advisor will be utilized to house information on applying for all statewide LMI Initiatives, as well as for other programs (*e.g.*, HEAP and WAP) for which customers may qualify. Development of a single application (and processes for use and handling of the customer information) will require attention to data privacy and information security issues, as discussed above.

The Program Administrators are currently assessing the opportunity for creation of a single application template for initiatives that are administered by different Program Administrators. This template will be used to create a common application among the Program Administrators; however, customers will still be required to fill out an application for the respective Program Administrator who is managing the initiative in the service territory in which they are applying. The Program Administrators anticipate the full roll-out of a single application template as the statewide initiatives are being developed.

6.3 Timeline

2020	• Determine application process as part of program design
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2021	<ul style="list-style-type: none">• Update NY Energy Advisor to include all relevant initiative applications, instructions to submit application and contact information• Provide first iteration of a single application template for initiatives implemented by multiple Program Administrators• Continue to identify opportunities to streamline applications as initiatives evolve
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