



June 20, 2019

Ms. Dale Bryk
Deputy Secretary for Energy and Environment
633 Third Avenue
New York, NY 10017

Dear Ms. Bryk,

We are writing to emphasize our support for the New Efficiency: New York (NE:NY) initiative and salute Governor Cuomo's bold vision in setting aggressive but realistic energy efficiency goals for the state. New York is poised to become a national leader by focusing on energy efficiency as a resource to meet one-third of the state's decarbonization goals.

The reliance on efficiency to achieve these savings targets underscores the importance of inter-agency cooperation to effectively deliver successful and timely results. We know from our work in other states that promoting inter-agency cooperation and communication among relevant agencies is crucial to achieving any state's energy savings goals.

Implementing NE:NY will require unprecedented cooperation between the New York State Energy Research and Development Authority (NYSERDA), the Public Service Commission (PSC), NYS Homes and Community Renewal and other relevant state agencies and offices. The need for these agencies to also provide intensive support and guidance to the NY Utilities, which now have expanded responsibilities, is similarly essential.

We believe that the Governor's Office is uniquely situated to provide strategic advice to all of the Agencies and offices that must work together to achieve the NE:NY vision. We are also encouraged by the success of previous inter-agency initiatives of Governor Cuomo's like those focused on New York's health care programs.

We are writing today to offer our technical assistance and support on the NE:NY initiative and to highlight several critical next steps in the implementation of NE:NY goals. We offer to engage with you in periodic stakeholder meetings to update these recommendations and assist with implementation activities where appropriate and at your convenience.

We urge the Governor's office to task state agencies with incorporating the following priorities in the full range of regulatory proceedings, rate cases, and enforcement measures to achieve New York's goals. We respectfully provide the following specific and immediate recommendations to facilitate attainment of the NE:NY goals:

1. Ensure utility budgets are sufficient to meet the energy savings goals laid out by the Governor.
 - In the April 1, 2019 joint filing by the NY Utilities on energy efficiency targets and budgets, the utilities expressed concern that their initial funding levels were insufficient to meet the energy savings goals and requested the adjustment of their budgets as

- necessary.ⁱ Well-funded utility energy efficiency programs are essential to achieve NE:NY energy savings goals.
- New York can draw upon its historical leadership administering utility efficiency programs; the state's programs were ranked #3 nationwide by the American Council for an Energy-Efficient Economy (ACEEE) in its 2012 scorecard (whereas in 2018, New York fell to #6).ⁱⁱ
 - Appropriate price signals for the pursuit of all cost effective energy efficiency should be included in Public Service Commission actions, including NE:NY and rate case approvals.
2. Pass legislation now to implement statewide appliance standards, building code updates, benchmarking, and building energy labeling.
 - Making these changes will increase jobs, reduce emissions and save citizens money on monthly bills. Neighboring states have enacted, or are in the process of considering, similar standards and initiatives.
 3. Update the state's cost-effectiveness policies to ensure ratepayer funds are invested in all cost-effective energy efficiency measures. This will require:
 - improvements to New York cost-effectiveness testing based on the principles found in the National Standard Practice Manual (NSPM)ⁱⁱⁱ, and
 - significant updates to the NY Technical Resource Manual, which uses outdated calculation approaches. The manual's simplified calculations, developed in the 1980-90s, cannot adequately assess the impacts of today's smart technologies including fuel switching for electrification.
 4. Continue to participate in the Northeast Energy Efficiency Partnerships (NEEP)-led collaboration with other states to plan for the successful implementation of residential air-source heat pump (ASHP) deployment.
 5. Expand support for workforce development, training and certification of highly skilled energy efficiency technicians in New York's marketplace.
 - NYSERDA's implementation of New York's workforce development, training and certification requirements should seek to achieve--at minimum--the same levels of consumer protection, quality assurance and safety as those historically required by New York and other programs in the region.

We appreciate your attention to this matter, and we hope your office will find our suggestions useful to advance energy efficiency in New York and achieve Governor Cuomo's clean energy and energy savings goals. We stand ready to assist and support you in any way we can to help accomplish these goals.

Sincerely,

American Council for an Energy-Efficient Economy (ACEEE)
Advanced Energy Economy (AEE)
Building Performance Association
E4TheFuture

ⁱ <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={9CD3BC73-BFAE-46B1-B0E7-BBC7DFF249FF}>

ⁱⁱ <https://aceee.org/sites/default/files/publications/researchreports/e12c.pdf>

ⁱⁱⁱ <https://nationalefficiencyscreening.org/national-standard-practice-manual/>