



*Submitted via E-Mail*

[Board.Secretary@bpu.nj.gov](mailto:Board.Secretary@bpu.nj.gov)

January 28, 2022  
Secretary Aida Camacho-Welch  
New Jersey Board of Public Utilities  
P.O. Box 350  
Trenton New Jersey, 08625

**RE: Proposed New Jersey’s Clean Energy Program Fiscal Year 2022 True-Up Budget,  
Revised Budgets and Program Changes  
Docket Number QO21040720**

Dear Secretary Camacho-Welch:

The Energy Efficiency Alliance of New Jersey appreciates the opportunity to provide comments on the New Jersey Board of Public Utilities’ (“BPU’s”) Proposed New Jersey’s Clean Energy Program (“NJCEP”) Fiscal Year 2022 (“FY22”) True-up Budget, Revised Budgets and Program changes. With these comments, EEA-NJ hopes to provide the Board of Public Utilities with the information required to advance a thriving market for energy efficiency in New Jersey.

The Energy Efficiency Alliance of New Jersey (“EEA-NJ”) is a trade association for the energy efficiency industry, which is composed of a diverse range of professions—from contractors and manufacturers to engineers, architects, and software developers—and a local workforce that cannot be outsourced. Together with its sister organization, the Keystone Energy Efficiency Alliance (“KEEA”), EEA-NJ represents 75 business members who provide energy efficiency products and services in support of an industry that accounts for more than 30,000 New Jersey jobs. Our membership is large and diverse, with experience designing and implementing a variety of demand side management solutions and energy efficiency (“EE”) programs across the globe. Our aim is to guarantee the success of energy efficiency programs for both the businesses and the ratepayers of New Jersey—because our members’ livelihoods depend on it.

EEA-NJ supports the proposed reallocations in the True-up Budget and the BPU’s efforts to ensure that customers and trades/contractors will rightfully receive the incentives they anticipated when undertaking these projects under the energy efficiency programs. Customer and contractor support is critical to the long-term success of the energy efficiency programs.

EEA-NJ would recommend the BPU begin plans and preparation to expand the Comfort Partners program to the entire state. Understanding the total budget for the Comfort Partners program will remain unchanged for this budget cycle, the future expansion of Comfort Partners would greatly advance the BPU's equity goals.

Comfort Partners seeks to reduce high energy costs and lower energy bills by maximizing lifetime energy savings to improve energy affordability for low-income households through energy education, efficiency, and conservation. The program achieves these goals through direct install of cost-effective EE measures, customers education, and installation of health and safety measures.

Currently, Comfort Partners is administering a location-based eligibility pilot to reduce barriers to enrollment in the program. Customers residing within specific low-income neighborhoods will be eligible to participate in Comfort Partners without providing income verification documentation. However, the pilot is currently limited to ten (10) neighborhoods.

This type of location-based pilot has demonstrated success in other NJ utilities programs for moderate-income communities. Moderate-income residents participating in these programs are also exempted from showing income qualification to be deemed eligible for no-cost services based on where they live. However, lower income customers outside of the pilot neighborhoods, must still produce a burdensome host of documents to verify income. The BPU should look to the Working Group and program implementers' findings on this pilot and accelerate the permanent statewide implementation of this successful location-based program.

EEA- NJ submits these comments to the New Jersey Board of Public Utilities in support of its proposed revision of the New Jersey's Clean Energy Program Fiscal Year 2022 True-up Budget, Revised Budgets and Program changes, and recommends future state-wide expansion of the successful Comfort Partners location-based pilot program.

Sincerely,



John M. Kolesnik, Esq.  
Policy Counsel  
Energy Efficiency Alliance of New Jersey