



Submitted via E-Mail

board.secretary@bpu.nj.gov

July 27, 2022

Secretary Carman D. Diaz
Board of Public Utilities
44 South Clinton Avenue,
1st Floor Post Office Box 350
Trenton, NJ 08625-0350

**Re: IN THE MATTER OF PROPOSED UPDATES TO NEW JERSEY'S CLEAN
ENERGY PROGRAM: NEW CONSTRUCTION PROGRAM
DOCKET NO. QO22050327**

Dear Secretary Diaz:

The Energy Efficiency Alliance of New Jersey appreciates the opportunity to provide additional comments on the New Jersey Board of Public Utilities' ("BPU's") Proposed Updates to New Jersey's Clean Energy Program: New Construction.

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.¹ EEA-NJ champions efficiency as the foundation of a clean, just, and resilient energy economy. EEA-NJ's vision is that energy efficiency anchors all efforts to meet our ongoing energy needs, improve health and comfort, promote energy equity, and protect our climate.

¹ https://e4thefuture.org/wp-content/uploads/2021/08/New-Jersey_2021.pdf

EEA-NJ is pleased to express our support for and is excited to see these changes to the NJCEP New Construction programs, including the streamlining the application process, eliminating gaps in the programs, and creating one new construction program for all market types, along with better alignment of the programs with the State's Energy Master Plan goal of 100% clean energy by 2050. The new three-tier system of Bundled Pathway, Streamlined Pathway, and High-Performance Pathway creates a great opportunity for the State to meet customers where they are, while continuing to advance energy efficiency and achieving the State's energy goal. Including a middle tier in the Streamlined Pathway is the perfect example of an option that would fill in the "gap" between low-cost, simple prescriptive offerings, and expensive, complex higher-performance whole-building offerings. This middle option will help increase participation from smaller buildings that cannot carry expensive modeling costs, without sacrificing comprehensive energy efficient design.

EEA-NJ is glad to see the additional incentive tiers included in the initial deployment and rollout of the proposed changes, including projects to evaluate and create enhanced incentives for Affordable Housing to Residential and Multifamily projects (either directly or through a Rater incentive to promote equity). We also support adding a Multifamily Zero Energy Ready Homes (ZERH) incentive tier to encourage building electrification and adding Passive House incentive tiers, geared towards reducing overall energy use of a building.

EEA- NJ is pleased to submit these comments to the New Jersey Board of Public Utilities in support of its proposed revision of the Proposed Updates to New Jersey's Clean Energy Program: New Construction and welcomes future opportunities for engagement.

Sincerely,



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