

July 29, 2022

VIA ELECTRONIC MAIL

Carmen D. Diaz
Acting Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue, 1st Floor
Suite 314
P.O. Box 350
Trenton, NJ 08625

Re: Comments – New Construction Program (Docket No. QO22050327)

board.secretary@bpu.nj.gov

Dear Acting Secretary Diaz:

The New Jersey Utilities Association (“NJUA”) represents investor-owned utilities that provide electric, natural gas, telecommunications, water and wastewater services to residential and business customers throughout the State. I am writing on behalf of the electric and natural gas companies (“the Utilities”) that are members of the NJUA in response to the July 12, 2022 electronic notice from the Staff of the New Jersey Board of Public Utilities (“Board”), which provided notice of proposed updates to New Jersey Clean Energy Program’s New Construction Program for the residential, multi-family, commercial, and industrial markets, as well as a July 22, 2022 stakeholder meeting to present an overview of the proposed updates. The July 12, 2022 notice established a deadline for stakeholder comments of July 29, 2022. NJUA’s member companies reserve the right to submit comments on an individual basis.

The Utilities appreciate the Board’s effort to better align the New Construction Program with the State’s Energy Master Plan. While the “Proposed FY23 Revisions to NJCEP New Construction Programs” provided with the July 12 notice and presentation at the July 22 stakeholder meeting provided information on the proposed changes, the Utilities believe that coordination and further development of the changes to the new construction programs are needed to ensure full alignment and harmonization of the State’s new construction programs with the Utilities’ programs and with the distribution of the Clean Energy Act markets, targets and goals per the Board’s June 10, 2020 “Framework” Order (noting the utilities have a larger share of the targets). Specifically, the Utilities believe that all program descriptions should clearly specify that all rehabilitation construction projects that fall under Subchapter 6 of The Uniform Construction Code (N.J.A.C. 5:23) should be served through utility retrofit programs. This clarification will ensure that customers and trade allies understand which entity to approach regarding their projects.

The Utilities value the fact that the State has recognized the interaction between the new construction programs and the Utilities' programs and look forward to working with the State to finalize changes to the new construction programs in order to avoid duplication or market confusion. More specifically, the Utilities believe the following areas of collaboration and additional development of changes to the State's new construction programs should allow better coordination with the Utilities' programs:

- As noted at page 2 of the draft plan outline issued on July 12, 2022, the definition of gut rehab as defined and agreed upon with the utilities should, at a minimum, be reviewed to ensure clear delineation of program offerings; and
- The "phasing out single measure incentives", the plan to "Develop advanced bundle packages such as smart connections, electric/EV ready, intelligent load controls, solar+storage solutions" and the "bundled pathway" should be further developed in collaboration with the utilities.

Additionally, the Board may want to consider how to further expand the benefits of, increase access to, and remove barriers to participation in the New Construction programs in planning for the second triennial. The Utilities look forward to collaborating with the Board on the best way to deliver new construction programs in the future.

Thank you again for the opportunity to provide comments.

Sincerely,



Thomas R. Churchelow, Esq.
President & CEO