



FOUNDERS

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New Jersey Clean Energy Program

transmitted via email

RE: Comments on Proposed FY23 Revisions to NJCEP New Construction Programs

Dear Program Team:

The U.S. Green Building Council (USGBC), representing our nearly 8,000 member companies nationwide, and our strong community in New Jersey, supports New Jersey Clean Energy Program (NJCEP) proposed updates to the new construction program, and offers comments.

USGBC is a nonprofit organization working to build healthy, resilient, and equitable green buildings and communities for all. Best known for the Leadership in Energy & Environmental Design (LEED) green building certification system, we leverage education, credentials, events, communications, and policy advocacy activities to support high-performance buildings. More than 120 organizations in New Jersey are USGBC members and there is over 1 million GSF of LEED-certified space in the state.

We support NJCEP's updates to the new construction incentive programs, to increase effectiveness and update of the incentives, and aligning incentives with the New Jersey Energy Master Plan and Clean Energy Act. In particular, we applaud NJCEP in emphasizing whole building incentives with deep energy savings, and incorporating green building and advanced technologies to encourage even better grid-friendly buildings.

High-Performance Pathway

We support the inclusion of LEED in the High Performance Pathway. In doing so, New Jersey will join other states and utility efficiency programs in using third-part green building certification with LEED as a proxy or pathway for incentives. As NJCEP develops the specifics of the proposed updates, we recommend the agency consider equivalence across systems and align incentive value with goals. Specifically:

- NJCEP could consider specifying credits or points to ensure minimum energy performance and to reward deeper levels of efficiency and related measures that support high performance. Alexandria, Virginia, is an example of a program that requires certain credits and points for different green building systems.
- NJCEP could also consider tiers, with higher value incentives for higher levels of achievement. U.S. Housing and Urban Development (HUD), for example, requires new construction and housing reconstruction in certain grant programs to meet both (1) an energy efficiency standard and (2) a green and resilient standard, such as LEED.¹ This reflects the understanding that some types of systems

¹ See USGBC [article](#) and links therein.

are mainly focused on energy (e.g., ENERGY STAR) while other systems provide value-add on top of energy performance with best practices across multiple categories (e.g., LEED).

LEED incorporates many best practices that support New Jersey goals, such as commissioning, metering, and [refrigerant management](#). Our [brief](#) highlights some of the LEED elements that mitigate climate impacts including data illustrating outcomes.

Advanced Measure Bonus

We applaud the inclusion of additional incentives for advanced measures. We suggest that NJCEP provide options to integrate or align advanced measures incentives with the certification system proxy approach in the High Performance Pathway. LEED has credits for several advanced measures targeted by NJCEP, such as [grid optimization](#); [renewable energy](#); [EV charging and EV ready infrastructure](#); and others. A project would be more likely to utilize the advanced measures if the incentive criteria allows the incentive to be met and documented as part of its certification program. NJCEP could request certification programs to help crosswalk desired measures with the relevant credits.

Our [brief on utility incentives](#) provides examples of how LEED has been leveraged in efficiency incentive programs.

The program updates present an opportunity for NJCEP to advance New Jersey's leadership in better buildings, an essential element to meet state GHG reduction goals.

We are available to support NJCEP in understanding LEED and helping to structure the program for maximum benefit, as well as support technical review and quality control processes. Please contact me if there are any questions. We look forward to working with the department on this important program update.

Sincerely,



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cc:

