

September 6, 2023

Sherri L. Golden, RMC
Secretary of the Board
44 South Clinton Ave.
1st Floor PO Box 350
Trenton, NJ 08625-0350
Email: board.secretary@bpu.nj.gov

Re: IN THE MATTER OF THE IMPLEMENTATION OF EXECUTIVE ORDER 317
REQUIRING THE DEVELOPMENT OF NATURAL GAS UTILITY EMISSION
REDUCTION PLANS
Docket No.: GO23020099

Dear Secretary Golden:

The Energy Efficiency Alliance of New Jersey (“EEA-NJ”) thanks the New Jersey Board of Public Utility (“BPU” or “Board”) for this opportunity to submit comments on the straw proposal for the New Jersey implementation of the second triennium of New Jersey’s energy efficiency (“EE”) programs implemented pursuant to the New Jersey Clean Energy Act of 2018.

EEA-NJ is New Jersey’s trade association for the energy efficiency industry. With our sister organization the Keystone Energy Efficiency Alliance, we represent 70 business members across Pennsylvania and New Jersey. Our mission is to champion efficiency as the foundation of a clean, just, and resilient energy economy.

EEA-NJ appreciates this opportunity to provide input regarding Executive Order 317 and the Future of the Natural Gas Utility Proceeding. We encourage the Board to continue to engage in this endeavor holistically through coordination of the decarbonization effort across BPU programs, including with the Energy Efficiency programs, and maximizing federal investments to create an incentive structure that will have a compounding effect on decarbonizing New Jersey.

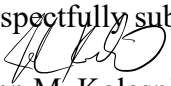
EEA-NJ offers the following considerations as the Board moves forward in the stakeholder process.

1. Pilot Opportunities:
 - Deploy pilots and programs across different ratepayer classes to test technical solutions.
 - Tailor projects to match the right technology with the appropriate measures.
 - Prioritize market-proven measures for scaling without the need for pilots.
 - Support emerging technologies with pilot projects to advance their viability.
2. Cost of the Project:
 - Fully funding building assessments and project development phases is crucial for success.

- Property owners may be unwilling to invest in "soft costs" that are essential for project scope determination.
 - Complex engineering requirements for decarbonization, such as transitioning from centralized boilers to in-unit systems, can be expensive.
 - Hot water replacement and envelope improvements are often needed.
3. Multifamily:
- Multifamily buildings have diverse attributes, including centralized and individual HVAC and hot water systems.
 - Establish a multifamily process that allows for flexibility in selecting appropriate measures.
 - Prioritize tenant education to ensure a positive resident experience before and after the project.
 - Support property managers in educating residents about decarbonization initiatives and equipment use.
 - Provide user-friendly guides and controls for new electrified systems to improve resident understanding.
4. Addressing Tenant Financial Implications:
- Electrification in multifamily buildings can lead to cost shifting from property owners to residents.
 - Centralized heating system replacement with individual systems may increase resident heating costs.
 - The addition of cooling may also impact tenants' expenses.
 - Programs should consider mechanisms for equitable cost-sharing through technological and financial approaches.
5. Consideration of Low- and Moderate-Income (LMI) Communities:
- Acknowledge that the majority of renters in multifamily units are low- and moderate-income households.
 - These communities are often located in overburdened areas with high energy costs and health issues.
 - Decarbonization efforts can address these issues through equipment modernization and performance upgrades.
 - Provide significant financial and technical support to encourage decarbonization in affordable housing.
 - Focus outreach efforts on property owners and managers in both formally and non-formally designated low-income properties.

EEA-NJ appreciates all the work BPU Staff has already put into this effort and Future of the Natural Gas Utility Proceeding. Thank you for the opportunity to submit these comments.

Respectfully submitted,


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