



Sherri L. Golden
Secretary of the Board
Board of Public Utilities
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March 27, 2024

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

Dear Secretary Golden:

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

EEA-NJ is New Jersey's trade association for the energy efficiency industry. With our sister organization the Keystone Energy Efficiency Alliance, we represent 65 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 is excited to see the improvements the Board has made to the New Construction program to lower barriers to entry and increase energy efficiency and environmental performance. Specifically there are several areas that are worth noting that will provide a significant impact in the Garden State. First, the program's single point of entry will allow for a more streamlined and improved experience for consumers and contractors. The utilization of the whole building approach across all three program pathways will drive projects to pursue electrification and decarbonization measures. Pairing this approach with the GHG Emission Reduction Bonus will provide even greater reductions of greenhouse gas ("GHG") emissions.

And the Garden State Challenge will act as a moonshot effort to spur innovation in a collaborative manner to aid in the achievement of New Jersey's clean energy goals.

EEA-NJ is also excited to see the Board's inclusion of the Workforce Development Reimbursement that provides incentives for the recruitment and training of new energy professionals. As the Board knows, the need for a skilled workforce continues to grow and this looks to provide a great opportunity to recruit, grow, and upskill the energy efficiency workforce.

EEA-NJ has a couple points of concern raised by our members. First regarding the program's incentive structure including the amount of subjectivity around the measurement of a building square footage: each high-performance building certification included in the program has different methods for measuring square footage. To ensure greater reliability on the square footage front, we would recommend providing details on how the square footage is to be measured and verified, and how it will align with each of the certifications' requirements. An alternative option may be a dollar per dwelling unit incentive rate.

EEA-NJ appreciates all the work Board Staff and TRC have already put in to improve the New Construction Program. Thank you for the opportunity to submit these comments.

Respectfully submitted,



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Policy Counsel

Energy Efficiency Alliance of New Jersey