



May 21, 2024

Secretary of the Board of Public Utilities
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Submitted via email to: board.secretary@bpu.nj.gov

Docket No. QO23100733, In the Matter of the Implementation of Federal Inflation Reduction Act HOMES (Home Efficiency Rebates) and HEEHR (Home Electrification and Appliance Rebates) Program

To Whom it May Concern:

New Jersey LCV is the statewide political voice for the environment. We elect environmentally responsible candidates to state and local offices, advocate for strong environmental policies, and hold our elected officials accountable to safeguard the health of our communities, the beauty of our state, and the strength of our economy. Thank you to the staff of the Board of Public Utilities (“the Board”) for the opportunity to comment on this matter.

The Inflation Reduction Act was the single-largest investment in climate in world history, and it is essential that New Jersey avail itself of all funding opportunities, particularly those that benefit low-, very low- and moderate-income customers.

We offer the following comments in response to the Board’s request for information, offered as general comments under question number six:

1. How well does this approach align with the goals of HER, HEAR, and the IRA more broadly?

3. What criteria and process could be used to select buildings for the M-RISE Program?

4. Does this approach address the unique needs of our state in terms of:
 - a. the need for efficiency and electrification upgrades in multi-family buildings?
 - b. the need for efficiency and electrification upgrades in low- to moderate-income households?

6. Do you have any other concerns regarding this approach or additional ideas for consideration?

We commend the Board for prioritizing LMI customers, as aligned with the program goals in Justice 40 and the spirit of many of the programs in the Inflation Reduction Act (IRA). We think it is prudent to use the infrastructure of the existing Comfort Partners program to build efficiencies where possible and reduce administrative/overhead burden. However, the outline for the Comfort Partners adder program discusses “electrification ready” and outreach/education programs. It does not specify a plan for bridging the next step and making those same Comfort Partners customers able to utilize the benefits of the IRA to replace their appliances with energy efficient ones beyond heat pumps. While you have trusted officials already in the home, with customers who are already familiar with federal clean energy programming, it makes sense to leverage that relationship by sharing all of the IRA benefit programs available to LMI customers – including for additional energy efficient appliances, such as a washer and dryer, and potentially for electric vehicles as well. Customers will be receptive to such information when state officials are already engaging with them on the topic, and it will increase efficiencies to advise them of *all* of the programming available to them at one time.

Regarding criteria for the selection of the M-RISE buildings, we urge the Board to consider not only existing housing stock, but *new construction*. With the recent passage of legislation reforming our affordable housing process, it can reasonably be anticipated that additional housing stock will become available for LMI New Jerseyans. We urge the Board to be prepared to leverage federal dollars to make new multi-family units not only electrification-ready, but fully decarbonized.

The cheapest energy is energy that you don’t use, and we therefore commend the Board for consideration of energy efficiencies in existing housing stock as well. Board should consider using these retrofits as an opportunity to share additional information about federal and state benefits that can be “stacked” – i.e., if in a home for an electrical panel upgrade, to share information about state and federal incentives for the purchase of an electric vehicle for an LMI customer who owns their home and could install a charger; or information about the community solar program for those who live in a multi-family unit.

Finally we urge the Board to ensure information about these programs are available in multiple languages, in a manner most accessible to LMI customers who can benefit from the programming.

Thank you for the opportunity to comment. Should you wish to discuss further, please contact Allison McLeod, our Senior Director of Public Policy, at Allison.mcleod@njlc.org.