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May 21, 2024

Sherri L. Golden  
Secretary of the Board  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
Trenton, NJ 08625

**RE: IN THE MATTER OF THE IMPLEMENTATION OF FEDERAL INFLATION  
REDUCTION ACT HOMES (HOME EFFICIENCY REBATES) AND HEEHR  
(HOME ELECTRIFICATION AND APPLIANCE REBATES) PROGRAM  
DOCKET NO. QO23100733**

Dear Secretary Golden,

On behalf of South Jersey Industries Utilities (“SJIU”) we are pleased to submit comments to the New Jersey Board of Public Utilities (“BPU” or “Board”) in the matter of the Implementation of Federal Inflation Reduction Act (“IRA”) Home Energy Rebate programs; the Home Efficiency Rebates (“HOMES”) and the Home Electrification and Appliance Rebates (“HEEHR” or “HEAR”) Programs.

SJIU includes two investor-owned utilities, South Jersey Gas (“SJG”) and Elizabethtown Gas (“ETG”) that provide natural gas services to residential and business customers throughout the State of New Jersey.

SJIU’s comments respond to question 6 of the proposal regarding concerns and ideas for consideration pertaining to the proposed M-RISE and CP-HEAR programs. SJIU appreciates the BPU’s efforts to utilize the funds available through IRA to support energy efficiency activities to low-income communities and multifamily premises. In reviewing Board Staff’s proposal, SJIU is supportive of the overall concept of using IRA funds to target these customer segments, however, SJIU seeks additional clarification as to how the proposed programs may interact with utility-led programs.

Included in the submitted plans for both ETG and SJG’s proposed portfolio of Triennium 2 energy efficiency programs are an income qualified program and a multifamily program that would seem to overlap with the proposed programs. SJIU is envisioning that the proposed multifamily program will be available to low-income multifamily customers and seeks clarification on in what manner Staff’s proposed programs will interact with utility-led programs to ensure that utility-led and NJCEP programs work in conjunction with and not in competition with each other. As such, SJIU requests additional information regarding program design and administration:

- Please provide additional information on how the proposed M-RISE program will interact with the utility-led multifamily program.
- Will customers be able to participate in both utility-led multifamily programs and M-RISE?
- Will the programs be integrated from the customer’s point of view? If so, how will funds be deployed and savings be attributed and verified?

### **Customer Experience & Market Interaction**

As described in Department of Energy’s (“DOE”) guidance, integrating rebates with existing programs provides a range of important benefits, including easier rebate access for households and contractors, streamlined and simplified intake and application processes to facilitate the customer experience, and further reducing household costs through connections to other low-cost financing resources.<sup>1</sup> With this goal and guidance in mind, SJIU seeks the following clarifications:

- How can the State and utilities work together to minimize confusion for participants and trade-allies as well as with respect to marketing and outreach activities?
- How can NJCEP and the utilities work together to minimize the administrative burden and application processes for customers and trade allies interested in both M-RISE and utility-led programs?

Regarding the creation of the CP-HEAR program and leveraging 15% of the HEAR funding toward customers who are eligible for the Comfort Partners program, SJIU suggests that

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<sup>1</sup> <https://www.energy.gov/scep/slsc/home-energy-rebates-program/integrating-home-energy-rebates-existing-programs>

customer savings could be maximized by deploying the CP-HEAR budget for customers currently being served by deliverable fuels and/or electric resistance heat.

SJIU appreciates the opportunity to provide these comments and looks forward to continuing to work with the Board on this matter.

Respectfully submitted,

A handwritten signature in cursive script that reads "Sheree L. Kelly". The signature is written in black ink and is positioned above the printed name.

Sheree L. Kelly, Esq.

SLK/caj