

**In the Matter of the 2024 New Jersey Energy Master Plan**  
**Docket No. Q024020126**  
**June 12, 2024**

Thank you for this opportunity to provide comments on the Request for Information (RFI) containing key questions for the 2024 update to the State's Energy Master Plan (EMP). Specifically, we will be addressing comments towards Strategy 3 of the 2019 EMP.

As indicated in the RFI, the 2019 EMP stated that the NJBPU should continue to engage with stakeholders to determine opportunities for increasing accessibility to energy efficiency programs, as well as develop program structures and methods for evaluating program success and utility goal achievement that value priorities such as increased program accessibility for hard-to-reach customers.

We applaud the NJBPU's work to expand energy efficiency programs that result in cost savings for small businesses and more comfortable workplaces with improved indoor air quality for employees. This helps not only the business receiving the upgrades, but also has the potential to create local jobs for contractors doing the work.

NJ-based Vanguard Building Solutions (VBS) was founded in 2013 and specializes in developing turnkey design-build energy and infrastructure projects for organizations of all sizes - helping them save money, reduce greenhouse gas emissions, strengthen operational continuity, and improve tenant comfort through the deployment of targeted Energy Conservation Measures.

Some highlights of our work in New Jersey include helping a local small laundromat complete over \$200,000 of HVAC and IAQ upgrades under the NJBPU SSB-VEER and SBDI programs. Similarly, we completed over \$350,000 of HVAC and IAQ upgrades for a continuous learning WMBE under the same NJBPU programs.

The difference between the programs was that the second project required the customer to obtain approval for an exception to the UEZ implementation parameters outlined by the utility and its administrator, allowing VBS to be a Trade Ally for the SBDI program. This process created delays and complications for the project and the customer.

While we understand that certain aspects of some programs implementing energy efficiency initiatives are under review with the pending Triennium 2 proceedings, we wanted to ensure that guiding principles for any programs developed to help New Jersey reach its goal of 100% clean energy by 2035 are embedded in the 2024 EMP.

We believe that programs supporting the 2024 EMP should foster a competitive, transparent, and equitable landscape for energy efficiency initiatives. This should include prioritizing the creation of an open and competitive network of trade allies and contractors throughout the programs offered by utilities. This is imperative to ensure fair business practices and equal opportunities for all contractors across the state.

In general, practices which limit energy efficiency work, especially in Urban Enterprise Zones (UEZs) and for non-profits and public entities, to a closed network of contractors should be prohibited.

A closed network:

- Restricts the growth and development of a larger and more diverse contractor ecosystem by hindering the potential for broader participation in projects.
- Reduces customer choice regarding selection of contractors and, in some cases, blocks customers from working with their preferred vendors.
- Risks exposure of proprietary company information, including design and pricing information, when out-of-network contractors seek permission or an exemption from program managers, who are also competitors in the marketplace.

Thank you for this opportunity to provide comments under the RFI. We look forward to continuing to work with the NJBPU as it develops the 2024 Energy Master Plan.

Regards

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