

# Statewide Low- to Moderate-Income Portfolio Implementation Plan

## Version 3

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Accelerated Energy Efficiency Targets and  
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Electrification Portfolios Through 2025

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## Version History and Description of Revisions: New York LMI Portfolio Implementation Plan

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
7/24/2020	1	Not applicable (NA) as first Implementation Plan	NA	NA
4/29/2022	2	New York policy context for LMI Portfolio	Updates to policy context in New York for LMI Portfolio, including regarding Disadvantaged Communities, the Two Million Homes Action Plan	Throughout Implementation Plan
4/29/2022	2	Achievements since 2020 Implementation Plan	Describes key achievements in advancing Statewide LMI Portfolio since 2020 Implementation Plan	Executive Summary, Throughout Implementation Plan
4/29/2022	2	Coordination Points	Updates on addressing key Coordination Points (data sharing between the Utilities and NYSERDA; Evaluation, Measurement, and Verification; Implementation Contractor procurement; Marketing; and Statewide Application	Section 2.3.1, Throughout Implementation Plan
4/29/2022	2	LMI Joint Management Committee and Executive Council	Update to Joint Management Committee Process, including establishment of LMI JMC Executive Council	Sections 2.4.2, 2.4.2
4/29/2022	2	Stakeholder Engagement	Updated description of Portfolio stakeholder engagement activities	Section 2.4.3, Throughout Implementation Plan
4/29/2022	2	Performance Metrics	Updated information on performance metrics, including status of providing data	Section 2.5, Throughout Implementation Plan

4/29/2022	2	Eligibility Criteria	Update of Portfolio Eligibility Criteria, including geographic eligibility	Section 2.6, Throughout Implementation Plan
4/29/2022	2	Budget and Benefit Updates	Updates to budgets and benefits, including (1) to reflect performance since 2020 Implementation Plan; (2) key drivers of cost trends; (3) identification of costs efficiencies achieved and being pursued; (4) updated Portfolio and Program Administrator budgets and benefit information	Section 3, Throughout Implementation Plan, Appendices A-D
4/29/2022	2	1-4 Family Homes Initiatives	Updates include: planning to combine EmPower NY Low-income program and Assisted Home Performance with Energy Star moderate-income program into EmPower+ Program, to be launched in 2023; changes to programs including streamlined EmPower application; coordination between NYSERDA and the Utilities, including data sharing and referrals	
4/29/2022	2	Milestones	Updated current and future milestones for the Portfolio and new appendix mapping 2020 and 2022 Implementation Plan milestones	Sections 4-8, Appendix F.
4/29/2022	2	Existing Affordable Multifamily Buildings	Updates include: development and launch of new statewide Affordable Multifamily Energy Efficiency Program (AMEEP) with focus on comprehensive measures and projects; transition of prior Program Administrator	Section 4.2.1

			multifamily programs to AMEEP	
4/29/2022	2	Technical Assistance for Affordable Multifamily Buildings	Updates on NYSERDA FlexTech program, including integration into AMEEP	Section 4.2.2
4/29/2022	2	Template Presentation for Sections	Numerous sections have been reformatted to follow a consistent template	Sections 4.6., 5.1, 5.2, 5.3, 8.
4/29/2022	2	RetrofitNY	Updates include added description and detail on program to advance deep energy retrofits	Section 4.2.3
4/29/2022	2	Affordable New Construction	Updates include added description and detail on NYSERDA affordable new construction initiatives	Section 4.3
4/29/2022	2	Pilots and Demonstrations	Updates include added description and detail regarding NYSERDA LMI pilots and demonstrations	Section 4.4
4/29/2022	2	Beneficial Electrification	Added description and detail regarding pilots, research, and other work to advance the inclusion of heat pump and other beneficial electrification measures in affordable multifamily buildings	Section 4.5
4/29/2022	2	Additional LMI Initiatives	Updates including added description and detail on the New York State Healthy Homes Value-Based Payment Pilot	Section 4.6
4/29/2022	2	Customer Awareness, Outreach & Engagement	Section 5. Customer Awareness, Outreach & Engagement has been restructured for consistency and clarity	Section 5
4/29/2022	2	LMI Portfolio Marketing	Additional information on LMI Portfolio marketing efforts including: statewide branding, the NY Energy advisor	Section 5.1



			website; hard copy customer education collateral and multilingual communications; community based marketing and paid advertising	
4/29/2022	2	Community-Based Outreach and Education	Information and detail on shift in NYSERDA programs from Community Energy Engagement Program (CEEP) to Regional Clean Energy Hubs	Section 5.2
4/29/2022	2	Community Based Customer Engagement	Updated information on: Utility partnerships with LMI community organizations focusing on measure distribution and education; and neighborhood engagement initiatives	Section 5.3
4/29/2022	2	Coordination with External Program Administrators and Other Organizations	Title change to indicate coordination with organizations other than external program administrators; inclusion of Long Island Power Authority	Section 6
4/29/2022	2	Benefit Cost Analysis	Description and results of revised Benefit Cost Analysis for LMI Portfolio	Section 7, Appendix E
4/29/2022	2	Evaluation, Measurement, and Verification (EM&V)	Description of EM&V activities since 2020 Implementation Plan, including development initial and revised Verified Gross Savings Specifications; added description on EM&V activity related to assessment of performance metrics	Section 8
5/31/2022	2	Budget and Benefit Updates	Updates to budgets and benefits, including restated Portfolio and Program Administrator	Section 3, Throughout Implementation

			budgets and benefit information for 2020 and 2021, and updated projections for 2022-2025	Plan, Appendices A-D
8/15/2022	2	Scorecard Program Mapping to Implementation Plan Statewide Categories	Addition of Appendix G tables, which map individual LMI programs as identified in Program Administrators' quarterly scorecard reporting to Implementation Plan Statewide Categories and Sub-Initiatives	Appendix G
8/15/2022	2	Budget and Benefit Updates	Updates to budgets and benefits, including restated Portfolio and NYSEDA budgets and benefit information for 2020 and 2021, and updated projections for 2022-2025	Section 3, Throughout Implementation Plan, Appendices A-D
11/1/22	3	Market Conditions	Updated description of market conditions impacting LMI Portfolio, in particular regarding timing and costs.	Executive Summary, Sections 3, 4.1, and 4.2
11/1/22	3	1-4 Family Program	Updates to 1-4 Family program redesign progress and updates to moderate income program project caps.	Section 4.1
11/1/22	3	Multifamily Program	Updates regarding AMEEP stakeholder engagement webinars	Section 4.2
11/1/22	3	Federal Funding	Reference to seeking federal funding to support LMI Portfolio, including Inflation Reduction Act.	Section 4.1
11/1/22	3	VGS Specifications	Updates regarding VGS Specifications, including to address completed evaluation of 1-4 Family program.	Section 8, 1-4 Family and Other LMI Initiatives Specifications
11/1/22	3	Budgets and Benefits Updates	Updated budget and benefit information,	Executive Summary,

			including Program Administrator-specific context regarding budgets and benefits	Sections 1, 3, Appendices A-D
11/1/22	3	Milestones	Updates to LMI Portfolio Milestones, including status.	Sections 4.1, 4.2, 4.5, 4.6, Appendix F.
11/22/22	3	Budget and Benefit Updates	Updates to budgets and benefits, including restated Portfolio and Program Administrator budgets and benefit information for 2020 and 2021, and updated benefit projections for 2022-2025	Section 3, throughout Implementation Plan, Appendices A-D
5/1/23	3	Budget and Benefits Updates	Updates to budgets and benefits, including the addition of Appendix B; restated Portfolio and Program Administrator budget and benefit information for historical years; updated budget and benefit projections for future years; additional detail added in Appendix A Table 4; and updates to Program Administrator-specific context regarding budgets and benefits in Appendix C. Update of terms throughout the document from Implementation Plan “targets” to Implementation Plan “benefits.”	Section 3, throughout Implementation Plan, Appendices A-D, H
6/28/23	3	Budget and Benefits Updates	Corrections to National Grid budgets and benefits for 2023-2025 throughout the document.	Section 3, throughout Implementation Plan, Appendices B-D

## Executive Summary

### Implementation Plan for Statewide LMI Portfolio

The New York Utilities<sup>1</sup> and the New York State Energy Research and Development Authority (“NYSERDA”) (together, “Program Administrators”) jointly file this updated 2022 Implementation Plan (“Implementation Plan” or “Plan”) for the statewide portfolio of energy efficiency programs and initiatives for low- to moderate-income (“LMI”) customers and communities in New York. The portfolio of programs and offerings outlined in this Plan (the “Statewide LMI Portfolio” or the “Portfolio”) is designed to create a holistic and coordinated approach to deliver energy efficiency to LMI customers and communities in New York and also to: (1) improve the experience of, and ultimate benefit for, LMI customers seeking to access clean energy services; (2) reduce administrative costs and increase the impact of ratepayer funding; and (3) provide more consistent and streamlined participation for service providers.

This Plan represents an update to prior versions of the Implementation Plan for the Statewide LMI Portfolio, which was first filed in July 2020 (“2020 Implementation Plan” or “2020 Plan”), with additional prior updates in 2022.<sup>2</sup> This Plan generally reflects the same broader context, goals, and approaches that informed and comprised prior versions of the Plan, and provides updates describing progress on numerous elements of the 2020 Plan since its filing (*i.e.*, through October 2022), as well as modifications to the 2020 Plan. This Plan also describes the current state of the Portfolio’s development and implementation and provides revised next steps, plans, and milestones going forward.

### Implementation Plan Context and Goals

The goal of this Plan is to advance energy affordability and access to energy efficiency for New York’s LMI residents and communities, while supporting New York State’s nation-leading climate policy to transition to carbon-free electricity systems and dramatically reduce greenhouse gas emissions. The Plan contributes to achieving key goals from the Climate Leadership and Community Protection Act<sup>3</sup> (“Climate Act”), including the requirement that disadvantaged communities receive no less than 35% (with a goal of 40%) of the overall benefits of spending on clean energy programs, by focusing on the

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<sup>1</sup> Central Hudson Gas & Electric Corporation (“Central Hudson”); Consolidated Edison Company of New York, Inc. (“Con Edison”); KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”), The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”), NMPC Power Corporation d/b/a National Grid (“NMPC”)(collectively “National Grid”); National Fuel Gas Distribution Corporation (“NFGDC”), New York State Electric & Gas Corporation (“NYSEG”); Orange and Rockland Utilities, Inc. (“Orange & Rockland”); and Rochester Gas and Electric Corporation (“RG&E”), (collectively, “Utilities”).

<sup>2</sup> Case 18-M-0084, *In the Matter of a Comprehensive Energy Efficiency Initiative* (“NE: NY Proceeding”), Statewide Low- to Moderate-Income Portfolio Implementation Plan (filed July 24, 2020), and Statewide Low- to Moderate-Income Portfolio Implementation Plan, Version 2 (filed April 29, 2022), First Update (filed May 31, 2022), Second Update (filed August 15, 2022). This Plan supersedes previous versions.

<sup>3</sup> Chapter 106 of the Laws of 2019. The Climate Act is available at <https://legislation.nysenate.gov/pdf/bills/2019/S6599>.

equity issues that can be most directly addressed by clean energy programs, such as energy affordability, reduced fossil fuel combustion to advance environmental justice, and enhanced community engagement. The Statewide LMI Portfolio will also advance Governor Hochul’s 2022 State of the State commitment to the Two Million Homes Action Plan to achieve two million climate-friendly homes -- one million efficient and electrified homes and one million electrification-ready homes -- by 2030, with at least 800,000 of the homes being LMI households (“Two Million Homes Action Plan”).<sup>4</sup> The initiative calls on NYSERDA, New York State Homes and Community Renewal (“NYS HCR”), New York State Department of Public Service (“DPS”), and Department of State to produce an executable plan and funding proposal by end of 2022 to guide achievement of this goal.

This Implementation Plan includes a budget of \$1 billion in new funding allocations across all of the Program Administrators from 2020-2025, with estimated lifetime electric savings of 8,369,484 megawatt hours (“MWh”), and gas and other delivered fuels savings of 182,383,271 million British Thermal Units (“MMBtu”), while serving an estimated 2 million participants.<sup>5</sup> The Plan is consistent with directives from the New York Public Service Commission (“Commission”), including the Accelerated Efficiency Order<sup>6</sup> from December 2018 and the 2020 NE: NY Order<sup>7</sup> from January 2020, which specify spending 20% of incremental energy efficiency funding on LMI customers with 40% of that spending allocated to affordable multifamily buildings.

The Plan also outlines major advances in the planning and delivery of energy efficiency initiatives for LMI New Yorkers. Whereas historically the Utilities and NYSERDA have separately run different LMI programs and offered different services across the state, this Plan reflects a more consistent and accessible program framework whereby the Program Administrators jointly design, implement, maintain, and improve a single Statewide LMI Portfolio of programs. Benefits of this approach include enhanced and more consistent services and offerings across the state; increased efficiencies and associated cost reductions, including in Portfolio implementation, administration, marketing, and evaluation; and coordinated efforts to continually improve and enhance the Portfolio. LMI customers, contractors, and other market actors and stakeholders also benefit from

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<sup>4</sup> Governor Hochul Announces Plan to Achieve 2 Million Climate-Friendly Homes by 2030: <https://www.governor.ny.gov/news/governor-hochul-announces-plan-achieve-2-million-climate-friendly-homes-2030#:~:text=Governor%20Kathy%20Hochul%20today%20announced,reaches%20zero%20emissions%20by%202027.>

<sup>5</sup> Includes NYSERDA indirect savings, which are discounted by 50% and reported as plans throughout this Implementation Plan.

<sup>6</sup> NE: NY Proceeding, Order Authorizing Accelerated Energy Efficiency Targets (issued December 13, 2018) (“Accelerated Efficiency Order”).

<sup>7</sup> NE: NY Proceeding, Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios Through 2025 (issued January 16, 2020) (“2020 NE: NY Order”).

increased alignment of initiatives, incentive structures, marketing, and other Portfolio elements.

To date, the Program Administrators have implemented some impactful and significant achievements under the Portfolio framework. These achievements include:

- Designing and launching of the statewide Utility-administered Affordable Multifamily Energy Efficiency Program (“AMEEP”) on November 3, 2021, concurrent and coordinated with the phase out of NYSERDA’s Multifamily Performance Program (“MPP”);
- Developing and launching transformative partnerships between NYSERDA and affordable housing agencies to integrate technical assistance and efficiency and electrification incentive funding directly into affordable housing finance applications with NYS HCR and New York City Department of Housing Preservation and Development (“NYC HPD”), positioning the housing agencies to require high-performance all-electric design for affordable housing new construction and preservation projects ahead of anticipated mandates and regulatory requirements;
- Launching the Clean Heat for All Challenge, a partnership between NYSERDA, New York City Housing Authority (“NYCHA”) and New York Power Authority (“NYPA”) to spur heating and cooling equipment manufacturers to develop a packaged, window-mounted cold climate heat pump that can be easily installed and maintained, providing efficient, reliable heating and cooling to NYCHA residents (the partnership leverages Regional Greenhouse Gas Initiative (“RGGI”) funding and technical assistance from NYSERDA, NYCHA’s portfolio size and commitment to electrification, and NYPA’s procurement vehicle and project management);
- Selecting the first round of partners, including two affordable housing developers, under the Empire Building Challenge demonstration program and completing analyses to map out high-efficiency electrification retrofit strategies for high-rise multifamily buildings;
- Developing a combined application for 1-4 Family LMI programs and creating an online version, which includes geographic eligibility for households in low-income census tracts;
- Improving the low-income referral process, increasing awareness of and participation in cost-saving energy programs;
- Developing and launching the NY Energy Advisor for Income Eligible Energy Efficiency Programs website (“NY Energy Advisor”)<sup>8</sup>, a one-stop centralized customer-awareness website providing information on statewide energy efficiency and clean energy offerings and connecting eligible New Yorkers to energy programs, resources and assistance;

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<sup>8</sup> <https://energyadvisor.ny.gov/>

- Allocating \$10 million through NYSERDA’s Heat Pump Demonstration Study pilot to fund electrification as part of comprehensive energy efficiency upgrades for LMI households and affordable multifamily buildings and assess real-world barriers and solutions to make heat pumps more accessible and affordable for LMI customers;
- Developing and executing agreements with NYSERDA to administer funding through NYSERDA’s EmPower New York program (“EmPower NY” or “EmPower”) and to develop and implement the NY Energy Advisor website;
- Engaging with stakeholders through biannual statewide LMI Portfolio webinars, completing co-design phase of Regional Clean Energy Hubs initiative, engaging with AMEEP contractors and energy service providers through an affordable multifamily Participating Contractors and Industry Partners (“PC&IP”) webinar series, as well as periodic meetings with multifamily stakeholders and the Strategic Advisory Group (“SAG”), a stakeholder group convened by the DPS Staff (“Staff”) as part of its Performance Management and Improvement Process (“PM&IP”) regarding the Statewide LMI portfolio<sup>9</sup>;
- Developing and filing the Statewide LMI Joint Management Committee (the “JMC” or the “Committee”) Manual (“JMC Manual”), which describes the forum of the Program Administrators to meet, discuss, implement, and calibrate the execution of the Implementation Plan, as well as the establishment of a new LMI JMC Executive Council (“Executive Council”) that provides oversight and guidance to the JMC (filed December 22, 2021);<sup>10</sup>
- Ongoing coordination around Evaluation, Measurement, and Verification (“EM&V”) issues for the Portfolio, including developing and filing the Statewide LMI Verified Gross Savings (“VGS”) Specifications for the Statewide LMI Portfolio (“LMI VGS Specifications”);<sup>11</sup> developing standardized survey questions for statewide use when conducting process evaluation research; identifying key measures for further research to develop statewide and regional average existing condition baselines; coordinating on development of statewide EM&V scopes; and
- Developing a framework for combining and streamlining the EmPower NY program with Assisted Home Performance with ENERGY STAR (R) (“AHP”) into a single LMI program called EmPower+, informed by extensive stakeholder input,

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<sup>9</sup> See, NE: NY Proceeding, Commencement of Energy Efficiency & Building Electrification Performance Management & Improvement Process, (filed May 29, 2020.) See also, 2020 NE: NY Order, p. 60-61.

<sup>10</sup> NE: NY Proceeding, “Statewide Low- to Moderate-Income Joint Management Committee Manual, Version 2” (Filed: December 22, 2021). The initial JMC Manual was filed on October 14, 2020.

<sup>11</sup> NE: NY Proceeding, Consolidated LMI Verified Gross Savings Specifications (filed Dec. 14, 2020). Revised VGS Specifications are to be filed in Q2 2022.

including developing program management software for EmPower+, with anticipated launch in spring 2023.

As is described herein, the Program Administrators will continue to identify, assess, and implement the steps necessary to complete this shift to a Statewide LMI Portfolio and achieve the associated benefits over the period of the Plan, which began in 2020 and continues through 2025. These efforts are coordinated under the LMI JMC and LMI Executive Council,<sup>12</sup> and reflect ongoing engagement with and input from stakeholders, including members of the public, affordability advocates, and service providers. Given the breadth and rigor associated with implementing all aspects of the LMI Portfolio, the JMC will work with the Executive Council and stakeholders to align on top priorities for the period ahead. These may include: 1) ensuring achievement of LMI Portfolio ordered targets, including addressing and resolving target shortfalls, 2) assessing, identifying, and implementing LMI program design changes and integrating with the New York State Clean Heat Program (“NYS Clean Heat”) to increase gas efficiency savings and incorporate electrification incentives, with appropriate affordability protections, and 3) managing and optimizing overall effectiveness at reaching and serving more LMI customers through multi-pronged efforts to actively engage stakeholders and implement feedback, continuously improve EmPower NY referrals, the NY Energy Advisor website and awareness campaign, and increase outreach through the forthcoming Regional Clean Energy Hubs and utility outreach partnerships.

The design, development, and implementation of new statewide programs in 2020-2021 has allowed the Program Administrators to reflect on lessons learned throughout the process that can be applied going forward in the continued implementation and operation of the Statewide LMI Portfolio. An example of this includes the importance of understanding the different challenges faced specific to certain regions of New York, and solving for them in the format of a statewide program. The JMC structure has allowed the Program Administrators to surface and address these issues in a holistic way. Additionally, the Program Administrators found feedback from stakeholders invaluable in designing the programs. As the Statewide LMI Portfolio continues to grow, and programs continue to be implemented and scaled, the JMC will continue to seek feedback from participants and other stakeholders to improve the programs, so that participation increases and as many LMI customers are comprehensively served as possible.

Supply chain issues, labor and material shortages, and inflationary effects have increased project costs for both 1-4 family and multifamily markets. Many of these market challenges became visible in late 2020, increased in 2021 and 2022, and have impacted construction and new project development timelines. Program Administrators continue

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<sup>12</sup> The Order Approving Clean Energy Fund Modifications (“CEF Modifications Order”) issued September 9, 2021, ordered the formation of an Executive Level Council (“Executive Council”) to provide oversight and guidance to the LMI JMC.



to work with stakeholders and program participants to understand and adapt to these market challenges to facilitate timely and cost-effective delivery of energy savings and other benefits to LMI customers while meeting portfolio objectives.

The Program Administrators look forward to the NE: NY Interim Review and CEF Review process, initiated by Commission Order on September 15, 2022, with expected Commission action in 2023 to assess the LMI Portfolio and make adjustments as necessary.<sup>13</sup> The Interim Review will assess program design and administration, innovative practices, governance and oversight mechanisms, and targets and budgets required to support the Climate Act and other State goals and efforts. The Program Administrators will work closely with DPS Staff and key stakeholders to support the Review and implement directives following Commission Orders.

### Summary of Plan

The Plan is comprised of the following eight sections:

[Section 1. Introduction](#) describes the context for the Statewide LMI Portfolio and the breadth of the New York State policy landscape that this Plan is instrumental in advancing, including the Affordability Policy, the NYSERDA-administered Clean Energy Fund (“CEF”)<sup>14</sup>, the Climate Act and the Two Million Homes Action Plan. Consistent with the Climate Act, the Plan reflects the importance of increasing access to clean energy and efficiency programs for disadvantaged communities (“DACs”), which the Act defines as “communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high-concentrations of low- and moderate-income households”.<sup>15</sup>

[Section 2. Statewide LMI Portfolio](#) describes the overall approach to leverage the respective strengths of each of the Program Administrators in developing and implementing the Statewide LMI Portfolio. This section identifies objectives for the Plan, which complement objectives laid out in the Accelerated Efficiency Order, and which are linked to performance metrics that will measure and assess the Portfolio. This section also describes the approach to implementing, updating, and reporting on the Portfolio, including outlining the core functions of the LMI JMC, the LMI Executive Council, and stakeholder engagement. In addition, Section 2 describes the approach to maintaining the Portfolio, recognizing program evolution from its Status Prior to New Statewide LMI Portfolio Offering, to a Transitional Phase, to Full Implementation of the statewide approach. Section 2 also provides updates regarding several complex coordination and

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<sup>13</sup> NE: NY Proceeding and Case 14-M-0094, *Proceeding on Motion of the Commission to Consider a Clean Energy Fund* (“CEF Proceeding”), Order Initiating the New Efficiency: New York Interim Review and Clean Energy Fund Review (“Interim Review”) (Issued and effective: September 15, 2022). See also, NE: NY Proceeding, 2020 NE: NY Order, p. 59-60.

<sup>14</sup> CEF Proceeding, Order Authorizing the Clean Energy Fund Framework (issued January 21, 2016).

<sup>15</sup> 2019 Climate Leadership and Community Protection Act.  
<https://legislation.nysenate.gov/pdf/bills/2019/s6599>

administrative elements that were identified in the 2020 Plan after its filing as needing to be addressed to fully achieve that Plan’s objectives. Finally, this section describes the eligibility thresholds for qualification in the Portfolio, including the assessment of innovative approaches.

[Section 3. Budgets, Benefits, and Other Impacts](#) presents the Portfolio budgets and benefits for 2020-2025, both by year and by Program Administrator. Portfolio-level performance metrics by year are also provided. These Portfolio-level performance metrics are quantified and reported quarterly and can be viewed on the Clean Energy Dashboard.<sup>16</sup> Additional detail on budgets, benefits, and metrics is provided in the appendices.

This Plan includes revisions to projected budgets and benefits from the 2020 Plan based on updated information and analysis of the estimated costs of the statewide LMI initiatives. For several Program Administrators, the savings benefits described in this Plan differ materially from those in the 2020 Plan and are currently projected to fall short by up to 14% relative to the Accelerated Efficiency Order and 2020 NE: NY Order.<sup>17</sup> Section 3 summarizes key cost impacts which contribute to this including inflation and COVID-19-related supply chain issues, leading to discrepancies between Ordered and actual or projected program run rates.

In the administration of the Portfolio, the Program Administrators are preserving flexibility with annual budgets and production projections to provide for the ability to respond to increased demand and serve more households or buildings, as necessary. Where necessary and feasible (*i.e.*, given regulatory requirements), Program Administrators either have spent and/or will spend budgets from future years to meet program demand or have spent and/or will spend budgets from earlier years in later years for the same reason. Any such reallocations are reflected in this Implementation Plan, including in tables throughout the Plan.<sup>18</sup>

The Program Administrators remain committed to achieving cost efficiencies as the new initiatives being developed under the Portfolio reach maturity, and a wide array of options are being explored to achieve those goals, as described in [Section 4](#). The Program Administrators will continue to assess actual cost data to project future budgets and benefits as accurately as possible. The need to identify and achieve cost efficiencies and accurately project impact in service of increasing the impact of ratepayer investments and reaching more LMI customers with the benefits of energy efficiency further underscores the importance of the Program Administrators efficiently working together under the LMI JMC structure. Cost efficiencies identified and achieved or planned for by

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<sup>16</sup> See, <https://rev.ny.gov/cleanenergydashboard>

<sup>17</sup> Ordered amounts include additional rate case funds and savings benefits from NFGDC and National Grid (KEDLI).

<sup>18</sup> See, NE: NY Proceeding, 2020 NE: NY Order, p. 69-70.

the Program Administrators are enumerated in Section 3 and discussed in detail throughout this Plan.

[Section 4. Statewide LMI Portfolio Initiatives](#) describes the initiatives by sector, including:

- Existing 1-4 Family Homes
- Existing Affordable Multifamily Buildings
- Affordable New Construction
- Pilots and Demonstrations
- Beneficial Electrification
- Additional LMI Initiatives funded through CEF, including New York State Healthy Homes and Solar for All

The Existing 1-4 Family Homes and Existing Affordable Multifamily Buildings Initiatives represent the bulk of the Statewide LMI Portfolio budget. 32% of the total statewide Portfolio budget, including CEF investment, is allocated to Existing 1-4 Family Homes initiatives. 52% of the total Portfolio budget, including CEF investment, is allocated to Existing Affordable Multifamily initiatives. 67% of incremental Utility funding is allocated to Existing Affordable Multifamily initiatives as well.

Subsections for the Existing 1-4 Family Homes, Existing Affordable Multifamily Buildings, and Affordable New Construction sectors provide detail on the sector Initiatives and Services, Objectives, Status Prior to New Statewide LMI Portfolio Offering, Transitional Phase, and Full Implementation. These subsections also provide detail regarding the Target Market and Delivery Method, Eligible Measures and Incentive Structure, and Stakeholder/Market Engagement, which includes identifying Key Partners and Additional Considerations specific to that sector such as Additional Funding Sources, and outlines Implementation Milestones for the next several years under the Plan (*i.e.*, through 2024). This updated Plan provides significant new information for the multifamily initiatives and 1-4 Family Homes initiatives, reflecting significant assessment, stakeholder engagement, and redesign efforts from the Program Administrators since the filing of the 2020 Plan.

Pilots and demonstrations are a key element of the Plan, as opportunities for increasing access to energy efficiency solutions and improving energy affordability are ever-evolving, with new technologies, applications, business and delivery models, and opportunities for cross-sector coordination emerging on a regular basis. To continuously improve the programs and offerings under the LMI Portfolio, the Program Administrators will continue to incorporate the piloting and demonstration of new technologies and approaches for serving LMI customers and communities. The Program Administrators fund LMI pilots and demonstrations through the CEF, with the expectation that learnings will be communicated and deployed at a larger scale.

The Statewide LMI Portfolio includes investments in the LMI market segment in beneficial electrification, *i.e.*, transitioning to electricity from other fuel sources to reduce emissions of greenhouse gases and other pollutants. Portfolio investments in beneficial electrification seek to improve energy affordability and health outcomes, while maintaining consumer protection and increasing access to heat pump solutions for LMI communities, households, and building owners.

Additional LMI Initiatives funded through CEF were initially filed as part of the LMI Chapter of the CEF, and with the transition of the LMI elements of the CEF to this Implementation Plan, are presented in the Plan.

[Section 5. Customer Awareness, Outreach & Engagement](#) describes how customer awareness and education initiatives play a crucial role in creating lasting effects from energy efficiency for LMI customers. The success of the Portfolio relies on meaningful engagement with customers, contractors, and community partners through an effective customer awareness, outreach, and engagement campaign.

Within this section, objectives related to Customer Awareness, Outreach & Engagement are identified. Through multiple delivery channels, the Program Administrators will continue to deliver initiatives that will address the overall strategic development and coordination of these efforts. The initiatives build on existing program experience and provide a comprehensive and integrated statewide approach that Program Administrators expect will include the following key elements:

1. [LMI Portfolio Marketing](#), including:

- Statewide branding
- NY Energy Advisor providing online information about energy efficiency and clean energy as well as a one-stop shop to learn about and participate in the statewide Portfolio offerings
- Branded hard-copy program outreach and informational collateral to complement the online NY Energy Advisor website
- Delivery of community-based marketing and paid advertising

2. [Community-Based Outreach Education and Engagement Partnerships](#)

- Regional Clean Energy Hubs that serve as trusted local resources for community members to learn more about energy-related programs and services, and that foster development of outreach strategies to increase awareness and elevate the needs of communities and residents

3. [Community-Based Customer Engagement Initiatives](#)

- Delivery of community-based partnerships that combine distribution of low-cost EE measures with education about energy efficiency and clean energy and information on how to participate in other Portfolio programs
- Neighborhood-based delivery model

This section describes several updates and modifications on these elements from the 2020 Plan.

#### **[Section 6. Coordination with External Program Administrators and Other Organizations](#)**

reflects that, in addition to coordination amongst the Program Administrators, there are additional opportunities to work with programs administered by New York State agencies, local government, and community-based organizations to reduce redundancy and to increase synchronization, effectiveness, and overall impact for customers. Section 6 identifies these organizations and describes the nature of coordination with each, including through the LMI Joint Management Committee.

**[Section 7. Benefit Cost Analysis](#)** presents the summary results of the updated Benefit Cost Analysis (“BCA”) for the Statewide LMI Portfolio of initiatives, with additional detail provided in [Appendix F](#). As noted in the 2020 Implementation Plan, the BCA results will continue to be refined as the Portfolio initiatives are further developed, and will be updated as future iterations of the Implementation Plan are filed. Program Administrators note that there are many additional non-energy benefits not included in the calculation of the BCA that aid LMI customers.

**[Section 8. Evaluation, Measurement, & Verification Approach](#)** describes the coordinated approach that the Program Administrators take in estimating savings and evaluating LMI initiatives. This includes approaches to standardized statewide savings estimation, collaborative evaluation activities, and continuous monitoring of and feedback on performance metrics. Specific program-level savings estimation approaches and evaluation schedules are detailed in the VGS Specifications, which are filed along with this Plan. Section 8 provides a brief summary of these updated specifications.

## 1. Introduction

Pursuant to the 2020 NE: NY Order, NYSERDA and the New York Utilities (*i.e.*, the Program Administrators) jointly file this updated Implementation Plan describing the statewide<sup>19</sup> portfolio of energy efficiency programs and initiatives for LMI customers and communities.<sup>20</sup> This Plan reflects the Program Administrators' coordinated approach to advance energy affordability and access to energy efficiency for New York's LMI residents and communities. The statewide portfolio approach described in this Plan utilizes the Program Administrators' investments in a complementary manner that better serves the LMI market segment, further expands the reach of energy efficiency initiatives, and increases the impact of ratepayer funding. The portfolio of programs and offerings outlined in this Plan provides a more holistic and coordinated approach to delivering energy efficiency to LMI customers and communities in New York and also: (1) improves the experience of and ultimate benefit for LMI customers seeking to access clean energy services; (2) reduces administrative costs and increases the impact of ratepayer funding; and (3) provides more consistent and streamlined participation for service providers.

The investments outlined in this Plan seek to address the equity issues outlined in the Climate Act that can be most directly addressed by clean energy programs, such as energy affordability, reduced fossil fuel combustion through efficiency and electrification, and enhanced community engagement. The Climate Act requires that disadvantaged communities shall receive no less than 35% (with a goal of 40%) of the overall benefits of spending on clean energy and energy efficiency programs, and the Program Administrators continue to adapt the LMI investments to meet this and other requirements as the work of the Climate Action Council and Climate Justice Working Group ("CJWG") advances.<sup>21</sup> In December 2021, the CJWG decided on draft criteria for identifying DACs. In March 2022, the draft DAC criteria were released for public comment. The Program Administrators will look to apply the final DAC criteria to

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<sup>19</sup> For the purpose of the Statewide LMI Portfolio, these initiatives serve customers located in the territories of the Utilities defined and do not serve customers in other utility territories across the state, unless otherwise noted. NYSERDA and the Utilities coordinate and share information on initiatives with utilities not outlined in this Plan, to ensure alignment and advancement of energy efficiency initiatives across the State.

<sup>20</sup> This Plan is an update to the initial 2020 Implementation Plan and subsequent Plan revisions. This Plan primarily reflects updates and modifications to the 2020 Plan, in the two years (approximately) since the original filing, with some additional modifications from prior versions of the Implementation Plan filed earlier in 2022. See footnote 2, above.

<sup>21</sup> The Climate Justice Working Group is responsible for identifying disadvantaged communities, pursuant to the Climate Act, and it is expected that criteria for disadvantaged communities will be finalized in 2022. In addition, the Climate Action Council is responsible for developing a Scoping Plan to achieve the State's bold clean energy and climate agenda, which is expected in 2022. See, <https://climate.ny.gov/Climate-Justice-Working-Group>

program strategy, eligibility, and implementation to benefit these communities, and, until that time, consider interim approaches to reach disadvantaged communities.

### 1.1 LMI Market Segment: Context for Statewide LMI Portfolio

New York State’s LMI customer market is broad and diverse, with more than 3.5 million households (40% of the State’s households) qualifying as LMI.<sup>22</sup> Low-income households, which comprise about 2.3 million households in the state, are defined as those with annual incomes at or below 60% of the State Median Income. Moderate-income households, which comprise about 1.2 million households in the state, are defined as those with annual incomes between 60% and 80% of the State Median Income or the Area Median Income (whichever is greater).<sup>23</sup>

LMI households spend a disproportionate share of their annual income on energy bills<sup>24</sup> relative to other households in New York. In addition, LMI households often lack the time, financial resources, and information necessary to invest in or gain access to energy efficiency upgrades, even though they may benefit greatly from these improvements. LMI residents and communities also face challenges associated with quality-of-life issues, including health impacts associated with inefficient and deteriorating building stock due to lack of resources for regular maintenance and improvement.

Affordable housing providers, community organizations, and other market actors associated with affordable housing activities face similar obstacles. For instance, affordable housing owners and developers may lack the capital to invest in high-performance or clean energy improvements to their buildings. They also may not have access to resources and the technical expertise necessary to develop solutions for addressing the energy affordability issues faced by their residents.

More than 40% of New York’s LMI population lives in affordable multifamily housing exceeding five or more units per building.<sup>25</sup> Those who rent apartments in these buildings often do not have the ability to make their own energy efficiency upgrades, and those who own apartments are often restricted from making improvements by complex cooperative or condominium rules. Decisions to undertake energy efficiency investments in these circumstances often reflect a “split incentive” problem. For example, in buildings where tenants pay their own energy bills, there is little incentive for building owners to undertake such investments. Likewise, tenants who are likely to move in the near term

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<sup>22</sup> 2019 American Community Survey: <https://www.census.gov/programs-surveys/acs>

<sup>23</sup> The impacts of the COVID-19 pandemic on household income are not yet fully captured in economic data. The number of households qualifying as LMI in New York is generally expected to increase as a result of higher unemployment and reduced economic activity caused by the pandemic.

<sup>24</sup> According to 2020 Home Energy Affordability Gap data prepared by Fisher, Sheehan, and Colton and published in April 2021, energy burdens can exceed 30% of annual income for many low-income New Yorkers compared to 6% or less for higher-income New Yorkers:  
<http://www.homeenergyaffordabilitygap.com/>

<sup>25</sup> 2019 American Community Survey: <https://www.census.gov/programs-surveys/acs>

have no incentive to pursue such investments as they would not be able to reap the benefits over time.

The Statewide LMI Portfolio described in this Plan is intended to address the barriers that LMI customers can face in realizing the benefits of energy efficiency. These barriers faced by customers and challenges that the Program Administrators seek to overcome include:

- Limited LMI customer access to capital and financing;
- Limited awareness of energy efficiency programs and resources;
- Split incentives for affordable housing owners to make investments that improve tenant space;
- Administrative challenges in identifying and reaching LMI customers;
- Health and safety or structural deficiencies that impede progress on energy efficiency work; and
- Limited technical and engineering assistance for building owners.

Disadvantaged communities, which the Climate Act defines as “communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high-concentrations of low- and moderate-income households” also face greater challenges to accessing clean energy solutions.<sup>26</sup> Through the Statewide LMI Portfolio, the Program Administrators aim to increase access to energy efficiency and other clean energy solutions through direct investment in programs that can reduce energy burden for residents and communities, increase participation in eligible programs, and expand awareness of available resources and assistance. These solutions include offering home energy retrofits, improving the energy performance and overall quality of affordable housing, and increasing energy awareness among and engagement with residents and communities. The challenges that disadvantaged communities face are complex and, in some cases, broader than can be addressed through the Statewide LMI Portfolio alone. The Program Administrators continue to coordinate with State, local, and community-based organizations to identify opportunities for improving the impact of the Portfolio among disadvantaged communities.

## 1.2 Policy and Regulatory Landscape

The Statewide LMI Portfolio proposed herein will contribute to the advancement of the goals laid out in various New York State energy and climate policy matters including New Efficiency: New York (“NE: NY”), the Clean Energy Fund, and the Climate Act.

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<sup>26</sup> Chapter 106 of the Laws of 2019. The Climate Act is available at <https://legislation.nysenate.gov/pdf/bills/2019/S6599>.



The Affordability Policy,<sup>27</sup> which seeks to address energy affordability for low-income households, provides direct bill relief in the form of utility bill discounts for low-income customers, totaling approximately \$250 million annually. The Affordability Policy will work in tandem with the suite of clean energy programs discussed in this Implementation Plan to improve energy affordability for low-income New Yorkers.

The NYSERDA-administered CEF, instituted in 2016, seeks to improve energy affordability and access to clean energy for LMI households. In compliance with the 2020 NE: NY Order, all CEF investments in LMI households are incorporated into this Implementation Plan to provide a holistic view of all energy efficiency, building electrification, and renewable energy initiatives serving LMI households.

The NE: NY whitepaper (“NE: NY Whitepaper”), filed by DPS and NYSERDA in April 2018,<sup>28</sup> outlines a plan for substantially increasing the adoption of energy efficiency initiatives across all sectors of New York State’s economy. The NE: NY Whitepaper concludes that increasing the adoption of energy efficiency initiatives in the LMI customer market segment will provide multiple benefits not only in the form of energy and emissions reductions, but also through the delivery of more sustainable impacts for households and building owners as part of a comprehensive approach to addressing energy affordability. Given the size of the LMI market segment and the unique barriers faced by LMI households and building owners, the NE: NY Whitepaper outlines a number of policy, programmatic, and funding considerations for increasing adoption of these initiatives.<sup>29</sup> The PSC adopted many elements of this proposal into its Accelerated Efficiency Order, issued in December 2018.<sup>30</sup>

Signed into law in July 2019, the Climate Act outlines an ambitious climate and equity agenda for New York State that includes requirements for investing resources to benefit disadvantaged communities, requirements for the PSC to create programs to benefit LMI and disadvantaged communities, and requirements for mechanisms to track the adoption of clean energy solutions in the LMI customer market segment.<sup>31</sup> New York has

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<sup>27</sup> Case 14-M-0565, *Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers* (“Affordability Policy Proceeding”), Order Adopting Low Income Program Modification and Directing Utility Filings, (issued May 20, 2016). In the Affordability Policy Proceeding, the Public Service Commission developed a regulatory policy framework for addressing the energy affordability needs of low-income customers and established an energy burden target of 6% for all low-income customers.

<sup>28</sup> NE: NY Proceeding, *New Efficiency: New York* report (filed April 26, 2018).

<sup>29</sup> The NE: NY Whitepaper includes several recommendations for improving the adoption of energy efficiency in the LMI market segment, including the development of a comprehensive and effective approach to energy efficiency for LMI residents, and the allocation of at least 20% of any new energy efficiency funds to the LMI market segment.

<sup>30</sup> NE: NY Proceeding, *Order Adopting Accelerated Energy Efficiency Targets* (issued December 13, 2018) (“Accelerated Efficiency Order”).

<sup>31</sup> Chapter 106 of the Laws of 2019. The Climate Act is available at <https://legislation.nysenate.gov/pdf/bills/2019/S6599>.

made significant progress in implementing the Climate Act, including the publication of the Draft Scoping Plan, which serves as an initial framework for how the State will reduce greenhouse gas emissions and achieve net-zero emissions, increase renewable energy usage, and ensure climate justice. The Program Administrators will monitor developments and incorporate requirements related to the Climate Act, including directing clean energy program spending and benefits to disadvantaged communities in accordance with the finalized DAC criteria, once available, and the recommendations in the forthcoming Final Scoping Plan, as part of the implementation of the Statewide LMI Portfolio.

In addition to the energy and environmental policies that shape this Portfolio, New York State also has an ambitious agenda to advance the affordability and sustainability of housing across the state. In 2022, Governor Hochul announced the Two Million Homes Action Plan, a plan to achieve Two Million Climate-Friendly Homes – 1 million electrified, 1 million electrification-ready, and a minimum of 800,000 serving LMI households – by 2030.<sup>32</sup> In furtherance of this goal and advancing energy and housing affordability, New York’s FY2023 Executive Budget adopted Governor Hochul’s proposed \$25 billion 5-year plan for NYS HCR to create or preserve 100,000 units of affordable housing, including a new \$250 Million building electrification fund. In addition, in 2017, the City of New York advanced the Housing New York 2.0 plan, with goals to build or preserve 300,000 homes.<sup>33</sup> Further, in 2021, New York City passed a landmark law to phase out combustion of fossil fuels in new construction by 2027.<sup>34</sup> Affordable housing agencies have embraced a leadership role in developing and preserving affordable housing that is also highly efficient and electrified, which in turn can provide important co-benefits such as improved health outcomes and comfort of tenants and reduced operating costs for building owners.

## 2. Statewide LMI Portfolio

The Implementation Plan (both this version and the 2020 Plan) establishes the statewide portfolio of energy efficiency programs for LMI customers that allows the Program Administrators to address energy affordability in a holistic, coordinated manner. This portfolio approach also: (1) improves the experience of and ultimate impact for LMI customers seeking to access clean energy services; (2) reduces administrative costs; and (3) provides more consistent and streamlined participation for service providers.

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<sup>32</sup> <https://www.governor.ny.gov/news/governor-hochul-announces-plan-achieve-2-million-climate-friendly-homes-2030>

<sup>33</sup> <https://www1.nyc.gov/assets/hpd/downloads/pdfs/about/housing-new-york-2-0.pdf>

<sup>34</sup> <https://www1.nyc.gov/office-of-the-mayor/news/852-21/mayor-de-blasio-signs-landmark-bill-ban-combustion-fossil-fuels-new-buildings>

The Statewide LMI Portfolio aligns LMI investments that NYSERDA is making through the CEF and investments that the Utilities will make under the 2020 NE: NY Order and the Accelerated Efficiency Order. Through 2025, the Program Administrators are committing approximately \$1 billion<sup>35</sup> in clean energy investments through the Statewide LMI Portfolio. Beyond the Portfolio, NYSERDA and the Utilities are advancing initiatives that benefit disadvantaged communities through the CEF and the Utility System Energy Efficiency Plans (“SEEP”), including initiatives that contribute to the reduction of fossil-fuel combustion in facilities located in EJ areas or disadvantaged communities, workforce training and development focusing on priority populations, and improving access to solar for LMI or otherwise disadvantaged communities and affordable housing.<sup>36</sup>

## 2.1 Statewide LMI Portfolio and Program Administration

The Program Administrators will continue to leverage their respective strengths in the ongoing development and implementation of the Statewide LMI Portfolio. The blending of the statewide reach and market development components of NYSERDA’s CEF with existing Utility resource acquisition and customer relationship expertise, as well as increased LMI funding, enables the Portfolio to better address the barriers and challenges to expanding the reach of energy efficiency initiatives across the LMI customer market segment holistically. [Section 4](#) of this Plan, Statewide LMI Portfolio Initiatives, provides more detail about the working relationship among the Program Administrators.

## 2.2 Statewide LMI Portfolio Objectives

The Accelerated Efficiency Order provides a list of broad and wide-reaching objectives for the Statewide LMI Portfolio.<sup>37</sup> In developing the Plan, the Program Administrators used the guidance provided by the Accelerated Efficiency Order to establish clear objectives for the Portfolio, which can be effectively measured and assessed by the Program Administrators, the Commission, and other stakeholders, including through the tracking of Performance Metrics, which are described below. Specifically, the Portfolio establishes the following key objectives:

- Achieve savings goals within budget;
- Increase the number of customers served annually;

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<sup>35</sup> \$650.1 million in funding from the CEF and \$353.3 million in Utility funding.

<sup>36</sup> Through the CEF, NYSERDA has invested \$108 million to provide access to workforce training and development opportunities, with a focus on priority populations including residents of LMI communities and underrepresented populations including women and people of color, and disconnected youth. In June 2020, NYSERDA filed the 2020-2025 Operating Plan for NY-Sun, which outlines \$200 million of investments to increase access to solar for LMI households, disadvantaged and EJ communities, and affordable housing. In April 2022, the Commission approved the 10 Gigawatt Framework for Distributed Solar, which includes investments in rooftop and community solar for low-income and disadvantaged communities. Beyond workforce development and LMI programs, the utilities and NYSERDA administer programs that provide incentives to improve energy efficiency and reduce fossil fuel combustion in commercial, industrial, and institutional buildings.

<sup>37</sup> NE: NY Proceeding, Accelerated Efficiency Order, p. 53.

- Encourage customer adoption of comprehensive efficiency projects;
- Encourage new affordable housing to adopt more energy efficient profiles;
- Increase LMI customer and affordable housing owner awareness of the Portfolio’s energy efficiency programs and offerings;
- Achieve high customer satisfaction;
- Improve energy affordability for LMI customers; and
- Increase administrative efficiencies.

### 2.3 Implementation Plan Development and Maintenance

In many cases, the implementation of the Portfolio requires consideration of the alignment of initiatives and investments that the Program Administrators already have in place, such as implementation contracts. The 2020 NE: NY Order directed the Program Administrators to implement new initiatives as soon as possible but acknowledged that it takes time to do so.<sup>38</sup> As such, the 2020 Implementation Plan described a transition period in which existing initiatives continued and/or were transitioned, alignment between existing initiatives and investments would take place, and new or modified initiatives would be developed to launch beginning in 2021. The 2020 Plan differentiated these transitional milestones using the following framing:

- Current Status – outlined what initiatives were being offered in each sector in 2020<sup>39</sup>
- Transitional Phase – outlined the transitional elements that would be developed for each initiative and identified the remaining decisions and directions to be developed prior to full implementation
- Full Implementation – outlined the launch of modified or new initiatives. It is important to note that this is not the final state and as these initiatives evolve over time they will continue to be re-evaluated for improvements.

Since the July filing of the 2020 Implementation Plan, the Program Administrators have made significant progress from the 2020 Current Status to the Transitional Phase and Full Implementation. Accordingly, for this Implementation Plan, “Current Status” has been replaced by “Status Prior to new LMI Portfolio Statewide Offering.”

This Implementation Plan reflects that progress to date in 2022. It outlines the ongoing transition from what is offered today to a modified and new set of initiatives. The Program Administrators have continued to develop and plan the implementation for

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<sup>38</sup> NE: NY Proceeding, 2020 NE: NY Order, p. 101.

<sup>39</sup> The Plan replaces the term “Current Status” with the term “Status Prior to new Statewide LMI Portfolio Offering.”

each sector in the Statewide LMI Portfolio, as is described in the [Statewide LMI Portfolio Initiatives Section](#).

In accordance with the 2020 NE: NY Order, the Implementation Plan is jointly updated and filed when substantive modifications to the Portfolio are made based on Portfolio performance, input from stakeholders, and discussion amongst the LMI JMC. Additionally, annually, the Program Administrators file a Statewide LMI Program Annual Report detailing the Portfolio's performance through the previous calendar year, any substantive findings, and planned areas for future improvement.

### 2.3.1 Coordination Points

In the 2020 Plan, the Program Administrators identified several complex coordination and administration elements that needed to be addressed after that filing to fully achieve the Plan's objectives, such as administrative efficiencies and reaching more LMI households. The Program Administrators filed a Statewide Low- to Moderate-Income Joint Management Committee Coordination Plan ("Coordination Plan") on November 13, 2020, which detailed progress on and plans for addressing these topics; the Program Administrators provided additional updates on the topics in the 2020 and 2021 Annual Reports.<sup>40</sup> This list of topics includes the following: (1) data sharing between the Utilities and NYSERDA; (2) issues related to evaluation, measurement, and verification ("EM&V"); (3) implementation contractor ("Implementation Contractor") procurement; (4) marketing; and (5) statewide application. A summary of the status of each these points is provided below.

#### *Data Sharing Between the Program Administrators*

The Coordination Plan noted that an important component of achieving the goals and objectives described in the Implementation Plan is the efficient sharing of data between the Utilities and NYSERDA. As noted in the 2020 Annual Report, such sharing must, however, balance the improved customer experience and streamlined administration of programs, with the need for diligence in rules, processes, and systems that protect customer privacy and security consistent with Commission and Program Administrator policies, laws, and regulations. The Program Administrators developed the following approach:

- Identify the data sharing needs for the Portfolio to streamline customer access to all eligible programs and minimize administrative friction;
- Develop a comprehensive understanding of the existing data sharing framework in place;

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<sup>40</sup> NE: NY Proceeding, "Statewide Low- to Moderate-Income Joint Management Committee Coordination Plan" (Filed November 13, 2020). NE: NY Proceeding, 2020 Annual Report (filed April 1, 2021), pp. 6-8; 2021 Annual Report (filed April 1, 2022), pp., 12-16.

- Determine whether any gaps exist between data needs for the Portfolio and the existing data sharing framework; and
- Identify and implement solutions to address any gaps that are identified.

The Program Administrators have made significant progress regarding data sharing, including the following in AMEEP and EmPower NY:

### AMEEP

- NYSERDA and the Utilities co-developed and now administer a lead intake form for AMEEP. This provides a uniform intake experience for customers statewide and efficiently channels customers to the appropriate utility service territory and associated Implementation Contractor.
- NYSERDA updated terms in its Flexible Technical Assistance (“FlexTech”) program for customer consent authorizing NYSERDA to share FlexTech study information with the Utilities.
- Utilities aligned on and incorporated terms in the program application for customer consent authorizing the Utilities to share relevant application information with NYSERDA for coordination of technical assistance.<sup>41</sup>
- The Utilities are coordinating projects in overlapping service territories, which has required new and/or amended agreements and/or processes among the utilities and Implementation Contractors to enable the new customer experience and implement data sharing protocols to protect customer information, as well as updated program materials. The utilities are actively working to refine these efforts.

### EmPower NY

- For EmPower NY, there is enhanced bidirectional data sharing in place. The Utilities provide customer referrals to NYSERDA on a periodic basis, which Program Administrators described in detail in EmPower NY Referral Process filings submitted by each of the Utilities on October 25, 2021.<sup>42</sup> NYSERDA shares individual and aggregate referral status information with each Utility via an interactive dashboard.
- The Program Administrators developed and executed agreements to allow for centralized program delivery and additional utility funding through EmPower to serve more customers and improve coordination for the benefit of customers and service providers.

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<sup>41</sup> Usage data is not included in the application and is therefore not shared as part of this process.

<sup>42</sup> CEF Proceeding.

- The Program Administrators approved revised attestation language for EmPower NY in February 2022 to enable ongoing sharing of customer data and a single access point to the program.

The Program Administrators continue to coordinate to expand the existing consent language across programs, which customers sign to participate, to enable ongoing sharing of customer data so that a customer would only need to provide their information once to gain access to a range of programs for which they are eligible. In 2022, the Program Administrators will develop a method for sharing AMEEP program data as well as portfolio level data amongst themselves to track program and portfolio performance and identify areas for improvement. As the Portfolio evolves, the Program Administrators will continue to assess data sharing needs, including identifying any additional high-impact data-sharing use cases to prioritize in 2022 and beyond.

#### *Evaluation, Measurement, & Verification (“EM&V”)*

EM&V is addressed in detail in [Section 8](#).

#### *Implementation Contractor Models and Procurement*

The Program Administrators recognize the central function of Implementation Contractors in the Portfolio, noting that a more integrated set of initiatives between the Utilities and NYSERDA provides the potential to assess the role of Implementation Contractors to achieve economies of scale and reduce overall administrative costs within the Statewide LMI Portfolio.<sup>43</sup> The Coordination Plan identified and discussed a range of possible topics and solutions, including contracting timelines, Implementation Contractor functions, cost issues, and streamlining of different Implementation Contractor models among Program Administrators.

In developing the new statewide LMI multifamily program, the Program Administrators focused on the approach to procuring and contracting with Implementation Contractors. The Program Administrators assessed alternative Implementation Contractor<sup>44</sup> structures, and then selected and implemented a structure that enabled the expeditious and effective launch and implementation of the new Statewide program, currently using two Implementation Contractors for AMEEP, one covering Con Edison, Central Hudson, Orange & Rockland and National Grid’s KEDLI and KEDNY service territories, and one covering NFGDC, NYSEG, RG&E, and National Grid’s NMPC service territory.

For 1-4 Family Homes programs, a single Implementation Contractor model is used to deliver the LMI 1-4 Family Homes residential programs Statewide. NYSERDA administers the programs for the vast majority of the state, including municipal electric territories,

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<sup>43</sup> NE: NY Proceeding and CEF Proceeding, Statewide Low- to Moderate-Income Joint Management Committee Coordination Plan (filed November 13, 2020).

<sup>44</sup> See, NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio 2021 Annual Report (“2021 Annual Report”) (filed April 1, 2022), p. 15.

where supplemental energy efficiency incentive funding is provided through the RGGI Annual Operating Plan<sup>45</sup>, with implementation support provided by a third-party Implementation Contractor. In areas of the state where electric service is not provided by one of the Utilities, close coordination is occurring between the relevant electric providers (*i.e.*, on Long Island, and between NYSERDA and National Grid for the Home Energy Affordability Team (“HEAT”) Program).

In 2022 the Program Administrators will, in consultation with Staff, continue to identify opportunities for achieving further cost efficiencies and improvements in Implementation Contractor structures.

### *Marketing*

The Program Administrators developed and executed agreements to allow for centralized development and implementation of the NY Energy Advisor website and a statewide marketing campaign. Additional marketing details are provided in [Section 5](#).

### *Development and Use of Single Applications Across Program Administrators*

In the Coordination Plan, the Program Administrators identified the importance of assessing the program application process for participants. Feedback from customers, market actors, and other stakeholders confirmed the need to simplify and streamline the application process. The Program Administrators identified solutions to achieve these goals.

NYSERDA consulted with the LMI JMC on the design of a single statewide electronic application for the EmPower NY and AHP programs. The application portal was launched in 2021 and is working to expand access to information on these programs for customers in National Grid’s KEDLI service territory. Similarly, the Program Administrators developed and implemented a single statewide application and intake form for AMEEP. Links to both program pages can be found on the NY Energy Advisor website,<sup>46</sup> and the AMEEP application can be found on the Statewide AMEEP documents page.<sup>47</sup>

## **2.4 Portfolio Planning and Calibration**

The development and calibration of the Statewide LMI Portfolio is informed through various inputs, including program performance and market insight from stakeholders, and is overseen by the LMI JMC and LMI Executive Council. Stakeholder engagement is a critical element to the success of the Statewide LMI Portfolio, and the Program

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<sup>45</sup> RGGI Meeting and Planning Documents website <https://www.nyscrda.ny.gov/Researchers-and-Policymakers/Regional-Greenhouse-Gas-Initiative/Useful-Documents>

<sup>46</sup> <https://energyadvisor.ny.gov/>

<sup>47</sup> <https://www.nyscrda.ny.gov/All-Programs/Low-to-moderate-Income-Programs/LMI-Stakeholder-Resources-New-Efficiency-New-York/NYS-Affordable-Multifamily-Energy-Efficiency-Program>



Administrators use multiple avenues for engaging with stakeholders to receive feedback on current programs and identify opportunities for future initiatives.

The Program Administrators note the significant impact that the COVID-19 pandemic has had on LMI communities and on the execution of clean energy programs across the state, including on material availability, cost increases, and workforce impacts. The Program Administrators will continue to work with stakeholders, external administrators of energy efficiency programs, and communities to adapt initiatives in light of the COVID-19 pandemic and the resulting economic conditions.

#### **2.4.1 LMI Joint Management Committee**

As described in the Statewide Low- to Moderate-Income Joint Management Committee Manual,<sup>48</sup> the LMI JMC provides a forum for the Program Administrators to jointly develop and coordinate new market offerings and assess and refine ongoing programmatic activity, in accordance with the Implementation Plan. The LMI JMC consists of representatives from each of the Utilities and NYSERDA, including a lead representative from each organization who serves as the point of contact for Committee-related communications and administrative matters. The DPS Staff provides an oversight and consultative role for the JMC.

#### **2.4.2 LMI Executive Council**

On September 9, 2021, in the Order Approving Clean Energy Fund Modifications (“CEF Modifications Order”), the Commission ordered the formation of an Executive Level Council to provide oversight and guidance to the LMI JMC.<sup>49</sup> The Program Administrators’ JMC Manual Version 2, filed in December 2021, describes the purpose, membership, and core functions of the Executive Council, including communications with the LMI JMC.

In December 2021, the LMI JMC briefed the Executive Council on the status of Statewide LMI Portfolio milestones to guide priorities and workflow through 2022. Going forward into 2022 and beyond, the Committee will continue to engage with the Executive Council to accelerate the development of LMI Portfolio offerings.

#### **2.4.3 Stakeholder Engagement**

The effectiveness of the Portfolio largely depends on how well the initiatives and services function for customers and communities. Residents, communities, service providers, and other stakeholders provide beneficial insight that may otherwise not be readily and universally apparent. In combination with EM&V activities and Performance Metrics

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<sup>48</sup> NE: NY Proceeding, “Statewide Low- to Moderate-Income Joint Management Committee Manual, Version 2” (Filed December 22, 2021).

<sup>49</sup> NE: NY Proceeding, Order Approving Clean Energy Fund Modifications (Issued and Effective September 9, 2021), pp. 61-62, and Ordering Clause No. 9, p. 95. On December 22, 2021, the Program Administrators filed the updated Statewide Low- to Moderate-Income Joint Management Committee Manual Version 2, which describes the purpose, membership, and core functions of the Executive Council, including communications with the Committee.

results, stakeholder engagement and feedback contribute to providing the Committee with a holistic view of the Statewide LMI Portfolio. This wider view allows for improvement efforts and adjustments in alignment with market conditions. To inform the continued development and evolution of the Statewide LMI Portfolio and the ongoing operations of programs, the Program Administrators seek regular opportunities to engage with market partners and communities.

The Committee conducts two stakeholder engagement input sessions per year to review initiatives and services and Portfolio performance and discuss input with stakeholders comprised of staff from Community Based Organizations (“CBOs”), government, utilities, and other market partners. In addition, the Program Administrators conduct focused discussions with stakeholders through one-on-one and small group discussions to obtain input on proposed initiatives and services.

Details on each of the two annual stakeholder input engagement sessions, including meeting logistics, presentations, and a summary document reflecting key issues discussed, questions and answers received, and responses given during each stakeholder input engagement session are posted on the DPS Document and Matter Management website (“DMM”).<sup>50</sup> Further, materials are posted on the LMI Stakeholder Resources webpage, which was specifically designed to give stakeholders easy access to documents related to stakeholder engagement.<sup>51</sup>

In addition, the Program Administrators engage stakeholders as appropriate in additional forums to get input. For example, as described further in [Section 4.2.1](#), the Program Administrators engaged with stakeholders during the development of AMEEP in order to inform the design of the new program. As another example, in 2021, NYSEDA brought to completion a co-design process, jointly undertaken with over 30 stakeholder organizations, to develop the Regional Clean Energy Hubs initiative and the \$53M Regional Energy Hubs RFP, as described further in [Section 5.2](#).

At LMI JMC meetings and applicable working groups, the Program Administrators regularly share, discuss, and integrate stakeholder input. Further, the Program Administrators are regularly engaging with stakeholders through the administration of current programs; feedback received during such engagement is raised and discussed at the LMI JMC and/or appropriate working groups. Annual Reports provide additional detail on stakeholder engagement each year.<sup>52</sup>

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<sup>50</sup> NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio Stakeholder Webinar July 14, 2021 - Summary Report, (filed August 3, 2021); Statewide Low- to Moderate-Income Portfolio Stakeholder Webinar, November 17, 2021 - Summary Report, (filed December 10, 2021).

<sup>51</sup> See, <https://www.nyserda.ny.gov/All-Programs/Low-to-moderate-Income-Programs/LMI-Stakeholder-Resources-New-Efficiency-New-York>.

<sup>52</sup> See, *e.g.*, 2021 Annual Report, Section 4, pp. 16-18.

## 2.5 Statewide LMI Portfolio Performance Metrics

The Program Administrators will continue to measure the success of the Statewide LMI Portfolio in meeting the objectives identified above by tracking the Performance Metrics shown in [Table 1](#). Performance Metrics are foundational to assessing the Statewide LMI Portfolio's success and identifying areas for improvement. The Performance Metrics provide a roadmap for future Portfolio evaluation, guiding the investigation of and informing the basis for measuring performance. The objectives and corresponding Performance Metrics will be reviewed on a periodic basis and updated as appropriate to reflect Portfolio maturity. The list of objectives in Table 1 are not the only key objectives of this Portfolio but have been identified as those that should be tracked to report performance. The Program Administrators track and report the Performance Metrics related to savings and spending in Table 1 quarterly for the Clean Energy Dashboard (“CED”), as well as each Annual Report. [Appendix E](#) describes how the remaining Performance Metrics will be assessed and reported. The Program Administrators will be looking to set plans for and report on these remaining metrics (*i.e.*, related to customer experience and efficiencies), in the future as well. The Program Administrators will survey stakeholders and customers periodically to gauge their awareness of and satisfaction with the program offerings over time. The third column in this table, “Status,” addresses the current ability of the Program Administrators to assess each of the Performance Metrics. Challenging market conditions that began in 2020 have continued through 2022. These have led to material and labor shortages, delays and longer construction timelines, as well as increased material costs and labor rates.

Table 1: Portfolio Objectives and Performance Metrics

Portfolio Objective	Performance Metrics	Status
<b>Portfolio Savings &amp; Spend</b>		
Achieve Portfolio-wide savings goals within budget	MWh annual and lifetime savings achievements	Currently provided in CED and Annual Report
	MMBtu annual and lifetime savings achievements	Currently provided in CED and Annual Report
	CO2e Emission Reduction (metric tons) annual and lifetime savings achievements	Currently provided in CED and Annual Report
	Budget spent	Currently provided in CED and Annual Report
<b>Portfolio Participation</b>		
Increase the number of customers served annually	Number of participants <sup>53</sup> served	Currently provided in Annual Report

<sup>53</sup> For the purposes of this Plan, starting in 2022, “participant” is defined as dwelling units served in statewide programs. Dwelling units that receive both electric and gas measures are counted in both the

Portfolio Objective	Performance Metrics	Status
Adopt comprehensive <sup>54</sup> efficiency projects	Energy savings acquired from comprehensive projects	To be provided in the 2022 Annual Report
<b>Portfolio Customer Experience</b>		
Increase customer Portfolio awareness	Percentage of LMI customers that learn about Portfolio initiatives from various sources ( <i>e.g.</i> , NY Energy Advisor website, Utility or NYSERDA outreach materials, contractors, etc.)	Program Administrators, including EM&V teams, are currently discussing approaches for assessing, including survey instruments, to be coordinated with evaluation contractors
Achieve high customer satisfaction	Participation satisfaction rating	
Advance energy affordability for LMI customers	Participant bill savings, annual and lifetime	Currently provided in Annual Report
<b>Portfolio Efficiencies</b>		
Increase efficiencies of Portfolio investments <sup>55</sup>	Cost associated with all Portfolio investments	To be provided in the 2022 Annual Report comparing year over year spend and unit costs (\$/MMBtu)

## 2.6 Eligibility Thresholds

For the purposes of establishing categorical eligibility and creating consistency in the market where possible, the income thresholds used to determine eligibility for LMI initiatives are aligned with other state and federal energy and housing programs. The definition of “low-income” is a household income that is at or below 60% of the State Median Income and is consistent with income eligibility criteria used by the Home Energy

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electric and gas category by utility but will only be counted once at the state level. This approach is consistent with past LMI Implementation Plans, though it is noted that the 2022 LMI Annual Report reported participants in alignment with Clean Energy Dashboard scorecards, which count participants in both electric and gas categories, where applicable. The LMI JMC is working towards resolving the reporting methodology for participant counts between future Implementation Plan and Annual Report filings in 2023. Prior to 2022, the definition of participants depended on the initiative type, and may have referred to households, multifamily buildings, tenants, and/or accounts.

<sup>54</sup> NE: NY Proceeding, Accelerated Efficiency Order, p. 36. The Accelerated Efficiency Order states “Comprehensive programs that combine lower cost-effective measures with higher cost-effective measures can optimize the total reduction that can be attained through a single customer transaction. Further, comprehensive building efficiency improvements often result in the installation of measures with longer effective useful lives (EUL), resulting in savings that persist well into the future.”

<sup>55</sup> Such efficiencies are described in [Section 3](#), and may apply to categories including, but not limited to, administration, implementation, marketing, incentives, and EM&V.

Assistance Program (“HEAP”)<sup>56</sup> and the Weatherization Assistance Program (“WAP”). This establishes the receipt of HEAP or WAP as an income eligibility proxy rather than relying on determinations from NYSERDA and the Utilities. The definition of “moderate-income” is a household income that is below 80% of the Area Median Income or State Median Income, whichever is greater, and aligns with federal Housing and Urban Development (“HUD”) definitions for eligibility for affordable housing.

For the purpose of establishing categorical eligibility for affordable multifamily initiatives, affordable housing is defined as buildings that have regulatory agreements with a housing agency or in which at least 25% of the units are, or are expected to be, occupied by households earning not more than 80% of Area Median Income or State Median Income, whichever is greater.<sup>57</sup>

Where categorical eligibility cannot be established for programs, income screening may be conducted on an individual customer or building basis. Consistent with the 2020 NE: NY Order, the Utilities and NYSERDA will continue to develop necessary processes and agreements for NYSERDA to conduct income verification for participation in LMI initiatives, where necessary. In addition to applying traditional income eligibility criteria, the Program Administrators will continue to incorporate alternate methods of determining eligibility for programs, such as geographic eligibility, census-tract, demographic or other means of categorical eligibility.<sup>58</sup> This is expected to become increasingly important as the state seeks to invest more in disadvantaged communities per the Climate Act, and as Program Administrators seek more community-based and streamlined ways of delivering services.

With the launch of the combined program application, the EmPower program was able to add geographic eligibility as a method of determining program eligibility. Working with a subset of data used to inform draft DAC criteria development, the program identified census tracts where 50% or more of the residents were at or below 150% of the federal poverty line. All the residents of these areas are categorically eligible for EmPower and are not required to provide income documentation. Since the launch of this feature 17% of the applications to the program have come from these communities. Adding this method of determining program eligibility helps to reduce administrative costs, increase

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<sup>56</sup> Federal Low-Income HEAP regulations establish the maximum income level allowed at 150% of the poverty level, except where 60% of SMI is higher. New York State has adopted the higher of 60% SMI or 150% Federal Poverty Level as the maximum income level allowed. Information on HEAP to be found at: <https://otda.ny.gov/programs/heap/>.

<sup>57</sup> Buildings that do not pay into the System Benefits Charge are not eligible for services through the Statewide LMI Portfolio of initiatives. However, NYSERDA administers Regional Greenhouse Gas Initiative (RGGI) funding, which can be used in some cases to fund projects located in municipal utility territory. The Program Administrators will coordinate with PSEG-Long Island to coordinate where necessary to ensure consistency in program offerings for income-eligible customers across the state.

<sup>58</sup> Examples include customer participation in housing or social service programs.

the number of customers served and improves customers' experience accessing the program. The Program Administrators will look to adopt the final DAC criteria, upon its approval, as a means to increase participation by residents of disadvantaged communities.

### 3. Budgets, Benefits, and Other Impacts

The Statewide LMI Portfolio consolidates the initiatives and associated budgets and benefits of the CEF and the Utilities. The 2020 NE: NY Order and Accelerated Efficiency Order combined approved a minimum of approximately \$308.3 million in statewide Utility incremental budgets for LMI gas and electric programs through 2025. As defined below, an additional \$45 million in other utility funding will be allocated to this Portfolio. Through the CEF, NYSERDA is incorporating \$650.1 million into the Portfolio to fund LMI clean energy initiatives over the same time period.<sup>59, 60</sup> Combined, the Statewide LMI Portfolio will invest approximately \$1 billion in LMI clean energy initiatives, with total annual savings benefits of 10,776,396 MMBtu and 516,434 MWh.<sup>61</sup> Additionally, in their Long Island territory (KEDLI), National Grid is investing additional funding approved in their most recent rate case<sup>62</sup> to support the HEAT program. Furthermore, NFGDC's pre-existing LMI funding and performance targets that were approved in its February 2019 Energy Efficiency Transition Implementation Plan/System Energy Efficiency Plan ("ETIP/SEEP") filing to support its Low Income Usage Reduction Program ("LIURP") are also incorporated into the present Statewide LMI Portfolio, and will continue to be included in Statewide LMI Portfolio in the future.<sup>63</sup> In an effort to maximize participation in AMEEP, Central Hudson is currently planning to exceed its cumulative gas LMI portfolio budget through a corresponding underspend of the cumulative authorized budgets for electric LMI, electric non-LMI, and/or gas non-LMI programs.<sup>64</sup> Initiatives funded through

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<sup>59</sup> The \$650.1 million in CEF funding builds on the \$255 million that was already committed in the LMI Chapter of the CEF in 2020, which outlined the investments that have been made to advance energy affordability and access to clean energy solutions through the CEF. With the filing of the 2020 Implementation Plan, NYSERDA closed out the LMI Chapter of the CEF and included all future investments in clean energy in the LMI market segment in this Implementation Plan.

<sup>60</sup> Some NYSERDA investments have longer project timelines than through 2025, such as incentives for affordable new construction. While all funding will be committed by 2025, it may require an additional 5 years for all funds to be expended. This dynamic is reflected in budget and benefit tables in this Plan.

<sup>61</sup> Includes NYSERDA indirect annual savings, which are discounted by 50% and reported as plans in this Implementation Plan.

<sup>62</sup> Case 19-G-0310 et al – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulation of KeySpan Gas East Corporation d/b/a National Grid for Gas Service, *Order Approving Joint Proposal, as Modified, and Imposing Additional Requirements (issued August 12, 2021)*, p. 164.

<sup>63</sup> See [Appendix A Table 4](#).

<sup>64</sup> Central Hudson is currently planning to exceed the minimum cumulative gas LMI portfolio spending of \$2,124,356 established within the 2020 NE: NY Order by \$182,135. Utilizing the flexibility provided within the 2020 NE: NY Order, this expenditure will be addressed through a corresponding underspend in electric LMI, electric non-LMI, and/or gas non-LMI programs. Total expenditures across all portfolios are forecasted to meet the total authorized amount in the 2020 NE: NY Order.

the Portfolio include a combination of statewide initiatives, initiatives tailored to local needs, coordinated outreach and education, and market development<sup>65</sup> activities.

The budgets and savings benefits presented below reflect revisions to projections from the 2020 Plan and prior 2022 Implementation Plan revision filings<sup>66</sup> based on updated information and analysis regarding the estimated costs and savings for the statewide LMI initiatives. For several Program Administrators in particular, the savings benefits described in this Plan differ materially from the targets set forth in the 2020 Implementation Plan and the 2020 NE: NY Order, with the result being a decrease in the projected level of savings.

A key factor behind this difference is that the budgets and benefits from the 2020 Implementation Plan, and the budgets and targets from the Accelerated Efficiency Order (issued December 2018) and the 2020 NE: NY Order (issued January 2020) were based on historic data (which predated those documents). Due to an array of market challenges, including inflation, COVID-19 pandemic-related costs, increased material costs, labor shortages, increased borrowing costs, and global supply chain issues, the unit cost data from that time period varies compared to actual unit costs seen in 2021. These market challenges have contributed to project delays and new project shortfalls. Generally, the historic data that underpins the ordered budgets and savings targets contained more projects that were completed at lower costs, with less effort and in shorter time spans than is expected to be seen in the future from this Portfolio, which is comprised of programs that encourage deeper and more comprehensive projects.

The Program Administrators note a greater discrepancy between the 2020 NE: NY Order and 2022 Plan run rates for the 1-4 Family Programs as compared to multifamily programs. Accordingly, the impact on utility savings is most pronounced for those utilities whose budget allocation leans most toward the 1-4 Family Homes sector, as opposed to multifamily. Similarly, utility gas programs show a greater discrepancy in run rates in current performance and future projections as compared to the 2020 NE: NY Order and 2020 Plan.

Program Administrator detail is included prior to the Program Administrator-specific budget and benefits tables in [Appendix C](#). In summary:

### **Benefits**

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<sup>65</sup>As part of the Portfolio, the Program Administrators fund activities intended to increase market uptake of energy efficiency solutions by providing technical assistance to building owners, builders, developers, and housing agencies, and conducting pilots and demonstrations to test and validate new technologies and approaches for delivering energy efficiency services in the LMI market segment.

<sup>66</sup> NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio Implementation Plan, Version 2 (filed April 29, 2022), First Update (filed May 31, 2022), Second Update (filed August 15, 2022)

- Projected achievement of ordered electric Utility Program Administrator savings targets varies from overachievement, to alignment, to underachievement relative to 2020 NE: NY Order and the 2020 Implementation Plan.
- Some utilities will meet or overachieve ordered targets, though several gas Utility Program Administrators project to underachieve relative to the 2020 NE: NY Order and 2020 Implementation Plan to a greater extent than electric.
- NYSERDA's funding is on a fuel neutral basis and aligns with the 2020 NE: NY Order and 2020 Implementation Plan budgets. NYSERDA projection regarding electric benefits is aligned; NYSERDA projection regarding gas benefits is aligned.

### **Budgets:**

- Utilities plan to spend their total ordered electric and gas budgets through 2025 but may shift funds between commodities and years to optimize the ability to achieve ordered targets.
- Some Program Administrators plan to allocate funds beyond the LMI funds authorized in the 2020 NE: NY Order, either from unspent funds from a prior year (within the NE: NY timeframe) from market rate energy efficiency programs, or from funding approved in Program Administrators' rate cases.

The Program Administrators acknowledge the challenge in providing highly accurate projections given that the initiatives going forward are generally different than what the Program Administrators have run in the past. This is exemplified by the Program Administrators' new multifamily statewide offering, AMEEP, launched in November 2021, and the planned launch of EmPower+ in spring 2023. Further, aggregate cost data that is available frequently reflects significant variance and unpredictability. The Program Administrators also note significant variance in costs at the project level due to a variety of factors from geographic availability of contractors, materials and labor costs, and existing condition of the home. Likewise, due to AMEEP recently launching and EmPower+ launching in the future, energy savings were forecasted conservatively due to uncertainty of program realization rates and may vary based on actual project performance.

The Program Administrators remain committed to achieving cost efficiencies to reduce overall costs. The Program Administrators are pursuing several initiatives in this effort, including:

- Aligning multifamily Implementation Contractor structures regionally, and continuing to explore potential efficiencies as the program scales to achieve lower costs;
- Improving the referrals, lead generation, and customer access for the 1-4 Family LMI Homes sector;



- Having a single application intake process for multifamily and 1-4 family programs, with a single lead intake form for multifamily to avoid administrative costs of passing information back and forth between Program Administrators;
- Pre- and post-project inspections have been streamlined to have a single inspection for all program purposes, avoiding the costs and inconvenience of numerous inspections;
- Efficiencies in program administration in areas of overlapping electric and gas utilities;
- Program Administrators working together on a single NY Energy Advisor site and a statewide marketing campaign;
- NYSEG and National Grid working together on a direct-to-customer lighting program; and
- Combining and streamlining the EmPower and AHP programs into one new program, EmPower+, that will serve the 1-4 Family LMI sector beginning in spring 2023 with the aim of achieving administrative cost efficiencies.

Similarly, the Program Administrators have worked to forecast as accurately as possible and will continue to assess actual program cost data to advance the accuracy of budget and benefit projections. The need to identify and achieve cost efficiencies and to advance the accuracy of future projections further underscores the importance of the Program Administrators' ongoing work together under the LMI JMC structure.

Based on Portfolio performance at the time of the Interim Review, the LMI JMC and Program Administrators individually may seek to address any discrepancies with the budgets and benefits.

### 3.1 Portfolio-Level Budgets

This section addresses the Program Administrators' go-forward plans to fund the Statewide LMI Portfolio through 2025. The information provided in this section may differ from the budgets listed in the 2020 NE: NY Order and the 2020 Implementation Plan and may change in future years due to the flexibility of budgets over years and between gas and electric initiatives, if applicable. For some Program Administrators, the budgets approved in the 2020 NE: NY Order and Accelerated Efficiency Order provide for the full recovery of all Portfolio costs, whereas for other Program Administrators, funding sources beyond those approved in the 2020 NE: NY Order are needed to fund the Portfolio costs and are being brought in from other areas.<sup>67</sup> The full breakdown of budget elements by market segment and Program Administrator is included in [Appendix C](#).

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<sup>67</sup> NE: NY Proceeding, 2020 NE: NY Order, pp. 65-69.

Table 2: Portfolio Electric Budgets (\$000)<sup>68 69</sup>

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Central Hudson			88	175	213	332						808
Con Edison	6,373	3,737	6,328	7,704	9,932	9,308						43,382
National Grid (NMPC)			996	1,996	2,569	3,339						8,900
NYSEG	880	495	1,219	2,220	2,426	3,057						10,297
Orange & Rockland			472	712	569	569						2,322
RG&E	504	382	668	1,153	1,206	1,331						5,243
NYSERDA <sup>70</sup>	63,959	87,334	107,668	68,031	81,294	94,473	78,589	48,356	19,315	1,100	-	650,120
<b>Total</b>	<b>71,716</b>	<b>91,947</b>	<b>117,440</b>	<b>81,992</b>	<b>98,208</b>	<b>112,409</b>	<b>78,589</b>	<b>48,356</b>	<b>19,315</b>	<b>1,100</b>	<b>-</b>	<b>721,071</b>

Table 3: Portfolio Natural Gas Budgets (\$000)

Program Administrator	2020	2021	2022	2023	2024	2025	Total
Central Hudson			239	558	685	927	2,409
Con Edison	5,001	14,780	24,963	26,848	35,459	27,247	134,299
National Fuel Gas Distribution Company	4,563	3,906	9,013	7,043	6,919	7,051	38,496
National Grid (KEDLI)	1,559	1,410	3,922	6,773	7,871	8,566	30,101
National Grid (KEDNY)			1,579	6,371	7,349	9,097	24,396
National Grid (NMPC)			1,360	4,706	6,578	8,123	20,767
NYSEG	78	786	1,436	3,446	5,624	7,524	18,894
Orange & Rockland			966	961	839	946	3,712
RG&E	52	525	865	1,721	2,760	3,330	9,254
<b>Total</b>	<b>11,254</b>	<b>21,407</b>	<b>44,344</b>	<b>58,427</b>	<b>74,085</b>	<b>72,811</b>	<b>282,328</b>

<sup>68</sup> Expenditures in years 2026-2030 reflect projected NYSERDA investments that have longer project timelines, such as incentives for affordable new construction, as noted above. While all funding will be committed by 2025, it may require an additional 5 years for all funds to be expended.

<sup>69</sup> Budgets and benefits presented in this Implementation Plan for 2020 and 2021 represent actual budget spend in those years.

<sup>70</sup> NYSERDA budgets are based on electric collections, and are presented in the electric budget table, however the funds are administered on a fuel neutral basis.

### 3.2 Portfolio-Level Benefits<sup>71</sup>

This section outlines the Utilities’ and NYSERDA’s Portfolio savings benefits from 2020-2025. The savings benefits reflect planned achievements based on available budgets. Timelines of projected benefits may slightly shift year to year within the broader goal of meeting the total MWh and MMBtu ordered targets by 2025. The full breakdown of benefits by market segment and Program Administrator is included in [Appendix C](#).

Table 4: Portfolio Electric Benefits (Annual MWh)

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Central Hudson			655	394	424	499						1,972
Con Edison	38,544	13,363	16,006	13,121	13,682	12,218						106,935
National Grid (NMPC)			7,985	2,150	2,492	2,868						15,495
NYSEG	1,278	262	7,758	4,173	4,540	4,836						22,846
Orange & Rockland			1,803	693	747	784						4,027
RG&E	789	282	3,949	2,284	1,359	1,468						10,131
NYSERDA (direct)	7,693	19,314	16,343	9,536	22,761	38,813	30,387	25,919	14,475	3,857	1,929	190,028
NYSERDA (indirect) <sup>72</sup>	3,583	1,297	2,535	5,395	5,573	7,402	13,603	18,952	20,758	27,051	58,854	165,001
<b>Total</b>	<b>51,887</b>	<b>34,518</b>	<b>57,033</b>	<b>37,745</b>	<b>51,579</b>	<b>67,899</b>	<b>43,990</b>	<b>44,871</b>	<b>35,233</b>	<b>30,908</b>	<b>60,783</b>	<b>516,434</b>

<sup>71</sup> Planned achievement throughout this Implementation Plan includes VGS impacts, *i.e.*, realization rate applied for evaluated savings and an adjustment factor applied for unevaluated programs. Historical achievement is as reported in CED scorecards.

<sup>72</sup> NYSERDA indirect savings are discounted by 50% and reported as plans throughout this Implementation Plan.

Table 5: Portfolio Natural Gas Benefits (Annual MMBtu)

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Central Hudson			635	2,654	3,332	4,568						11,189
Con Edison	94,722	202,544	240,922	230,807	276,892	177,542						1,223,429
National Fuel Gas	31,411	22,093	47,420	54,457	59,053	64,393						278,827
National Grid (KEDLI)	3,549	7,749	20,233	36,882	41,261	45,548						155,221
National Grid (KEDNY)			5,740	30,588	38,347	49,098						123,773
National Grid (NMPC)			2,924	26,565	36,807	43,921						110,217
NYSEG	944	2,651	7,995	19,394	26,492	35,085						92,560
Orange & Rockland			2,687	10,500	10,500	10,675						34,362
RG&E	1,003	1,564	5,825	10,741	15,696	18,823						53,651
NYSERDA (direct) <sup>73</sup>	171,866	246,956	295,136	291,330	416,521	812,115	562,455	455,165	73,250	20,357	10,179	3,355,328
NYSERDA (indirect) <sup>74</sup>	26,664	7,196	47,016	132,549	167,095	228,490	314,398	395,559	366,300	451,462	1,213,743	3,350,470
<b>Total</b>	<b>330,158</b>	<b>490,753</b>	<b>676,531</b>	<b>846,467</b>	<b>1,091,996</b>	<b>1,490,258</b>	<b>876,853</b>	<b>850,724</b>	<b>439,550</b>	<b>471,819</b>	<b>1,223,922</b>	<b>8,789,028</b>

Table 5.1: Portfolio Other Fuels Benefits (Annual MMBtu)

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
NYSERDA (direct)	55,642	81,228	87,986	90,675	116,415	244,864	187,619	167,003	2,750	1,071	536	1,035,789
NYSERDA (indirect) <sup>75</sup>	1,909	379	10,050	38,119	46,755	76,370	97,044	117,334	110,018	131,310	322,291	951,579
<b>Total</b>	<b>57,550</b>	<b>81,607</b>	<b>98,037</b>	<b>128,794</b>	<b>163,170</b>	<b>321,234</b>	<b>284,663</b>	<b>284,337</b>	<b>112,769</b>	<b>132,381</b>	<b>322,827</b>	<b>1,987,368</b>

### 3.3 Portfolio-Level Impacts

Table 6 provides a collective view on Portfolio-level metrics that are quantified and reported quarterly and can be viewed on the Clean Energy Dashboard. The Portfolio-level performance metrics are planned achievements based on annual budgets and benefits. A breakdown of performance metrics by sector is included in [Appendix D](#).

<sup>73</sup> While NYSERDA does not administer natural gas budgets, NYSERDA does project MMBtu savings due to the fuel neutral nature of the CEF funds. MMBtu savings from fuels other than natural gas are presented below in Table 5.1.

<sup>74</sup> NYSERDA indirect savings are discounted by 50%

<sup>75</sup> NYSERDA indirect savings are discounted by 50%

Table 6: Portfolio-Level Performance Metrics

Performance Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Direct Annual MMBtu Savings <sup>76</sup>	359,135	564,785	717,501	804,593	1,041,316	1,506,632	750,074	622,168	76,000	21,428	10,715	6,474,347
Direct Lifetime MMBtu Savings	7,183,753	10,825,587	12,739,428	12,006,729	16,525,138	24,018,927	12,345,205	10,230,708	1,900,000	535,700	267,875	108,579,049
Indirect Annual <sup>77</sup> MMBtu Savings	28,573	7,575	57,066	170,668	213,850	304,860	411,442	512,893	476,318	582,771	1,536,033	4,302,049
Indirect Lifetime MMBtu Savings	698,325	189,375	943,489	2,201,818	2,849,545	4,310,286	6,307,362	8,577,961	8,088,050	10,265,430	29,372,584	73,804,222
Direct Annual MWh Savings	48,304	33,221	54,498	32,350	46,006	60,487	30,387	25,919	14,475	3,857	1,929	351,434
Direct Lifetime MWh Savings	497,245	452,506	741,523	435,143	708,392	978,249	607,962	532,880	361,875	96,425	48,225	5,460,424
Indirect Annual MWh Savings	3,583	1,297	2,535	5,395	5,573	7,402	13,603	18,952	20,758	27,051	58,854	165,001
Indirect Lifetime MWh Savings	88,519	32,425	53,810	87,486	90,156	123,405	228,533	325,579	380,905	507,693	990,550	2,909,060
Leveraged funds <sup>78</sup> (\$'000)	42,711	76,044	50,048	299,429	415,822	436,248	417,497	175,425	10,929			1,924,153
Annual Participants <sup>79,80</sup>	520,352	97,777	379,817	315,962	365,253	324,772	17,035	7,197	5,175	1,429	714	2,035,482

<sup>76</sup> MMBtu savings include NYSERDA savings from fuels other than electric and gas.

<sup>77</sup> NYSERDA indirect savings are discounted by 50%

<sup>78</sup> Defined as the direct private investment from incentives and service initiatives which includes co-funding of pilots or projects at specific locations, including hard costs for efficiency/renewable/distributed generation, hard costs for metering and monitoring equipment like EMS/BMS, and soft costs of systems that occur during the time frame of program administrator engagement on the pilot or project.

<sup>79</sup> “Annual Participants” includes Customer Awareness, Outreach, and Engagement initiatives (see, [Section 5](#), below) that tend to reach a large number of customers. A detailed breakout by sector is included in [Appendix D](#).

<sup>80</sup> The definition of “participant” was standardized to “dwelling unit” for statewide programs starting in 2022.

### 3.4 Budgets for Affordable Multifamily Buildings

The Accelerated Efficiency Order directed that at a minimum, 40% of the collective incremental LMI funding be committed to serving affordable multifamily buildings.<sup>81</sup> As outlined in this plan, 67% of incremental energy efficiency budgets and 52% of total Portfolio budgets have been allocated to the affordable multifamily market segment. Budget flexibility across the Portfolio will need to be maintained to cumulatively meet the 40% threshold. [Appendix A](#) outlines the investments by sector and the percentage of incremental funding and of all funding that is planned to be spent on affordable multifamily initiatives.

## 4. Statewide LMI Portfolio Initiatives

The following sections provide an overview of the initiatives and investments that the Program Administrators are undertaking to address the barriers to adoption and increase access to energy efficiency solutions across the LMI market segment. The Portfolio includes initiatives serving existing 1-4 family homes, existing affordable multifamily buildings, affordable new construction, beneficial electrification, as well as funding for customer engagement and pilots with new approaches for adoption of energy efficiency for LMI residents and communities. The initiatives reflect changes implemented in achieving the Portfolio to date and highlight the work that will continue to be undertaken to transition from the prior set of programs and investments to the more cohesive Portfolio that is jointly administered by the Program Administrators. Beyond the transition of the initiatives, the Portfolio is expected to evolve over time, as outlined in [Section 2.4: Portfolio Planning and Calibration](#).

### 4.1 Existing 1-4 Family Homes

The Program Administrators have worked to improve overall energy affordability for LMI households living in 1-4 family homes by providing no-cost or subsidized energy efficiency upgrades and energy education for both renters and homeowners through the EmPower NY<sup>82</sup> program. Low-income households are eligible for no-cost energy efficiency improvements through the EmPower NY program, while moderate-income households are eligible for incentives of 50% of the cost of the energy efficiency upgrades through AHP. Those customers may also be eligible for no-cost energy audits and for low-cost financing of energy upgrades through the Green Jobs – Green New York (“GJGNY”) Program.

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<sup>81</sup> NE: NY Proceeding, Accelerated Efficiency Order, p. 55.

<sup>82</sup> For the purposes of this Implementation Plan, the Program Administrators continue to use “EmPower NY” as the brand for the Existing 1-4 Family Homes sector.

Leveraging the existing statewide 1-4 Family Homes framework of EmPower NY and AHP to reach more households and achieve economies of scale, EmPower+ has been designed and will be launched in spring 2023. The redesign of this initiative will:

- Align with HEAT and PSEG LI programs
- Improve identification and referral of customers by utilities
- Support more streamlined deployment models including pre-approved packages of measures
- Improve customer referral and enrollment by utilities
- Expand on direct install for moderate-income households
- Align measures, documentation, and processes
- Include geographic eligibility for disadvantaged communities
- Support community campaigns and other approaches to aggregate demand for energy upgrades and reduce per-home costs

Utilities will continue to prioritize the enrollment of low-income households with high energy consumption into the EmPower NY program to help reduce energy use and deliver long-term energy burden relief. The Utilities are working closely with NYSERDA to improve referrals of customers to the EmPower NY program to increase customer participation and lower acquisition costs.

Since late 2020, existing building projects have faced challenging market conditions due to supply chain delays, labor shortages, increased materials costs and increased borrowing costs. These market conditions have contributed to construction delays and pauses on new project development. Program Administrators are working with stakeholders to better understand these market challenges and may consider adjustments to programs to facilitate project development and meet program objectives.

**Objectives:**

- Reduce energy consumption and provide more sustainable energy burden relief for income-eligible households through in-home energy education and energy efficiency improvements
- Identify and address energy-related health and safety issues in homes
- Expand the impact and reach of energy efficiency investments through program coordination
- Engage and educate LMI customers on available programs and improve access to the benefits of clean energy
- Improve the referral of low-income households with high energy consumption to reduce energy burden

- Commence shifting toward decarbonization, in alignment with the Climate Act, through a stepwise approach to electrification and phase-out of fossil fuel use for home heating and hot water, starting with those use cases where electrification will provide both decarbonization and affordability benefits for the customer

**Overview**

<p>Status Prior to new Statewide LMI Portfolio Offering</p>	<p>In 2020, 2021, and 2022 up to the time of the filing of the Implementation Plan, the 1-4 family homes LMI customer market segment has been served by several programs including EmPower NY and AHP administered by NYSERDA statewide, the LIURP in NFGDC territory, and the HEAT program in the National Grid-Long Island territory. National Grid administered the EmPower Replacement Program in their Long Island territory, marketed under the brand name “Home Energy Affordability Team” (HEAT) program. It was designed to closely align with the EmPower NY program. The HEAT program provides gas energy efficiency and health, safety and resiliency measures to customers. The EmPower NY, LIURP, and HEAT programs have been available to low-income households and provided no-cost energy services, while the AHP program has been available to both low and moderate-income households, providing a 50% cost share towards the cost of an energy efficiency work scope. Utilities have been referring and continue to refer customers to EmPower NY.</p> <p>The EmPower NY program uses funding from multiple sources including CEF, NE: NY, RGGI and HEAP to increase the reach of the program across the state. In addition, the program closely coordinates with WAP and HEAP.</p>
<p>Transitional Phase</p>	<p>Through 2020, 2021, and 2022 up to the time of the filing of this Implementation Plan, the Program Administrators continued to offer the programs as they are currently designed, while programs and funding are transitioned into a cohesive statewide approach. The Program Administrators are working to combine LMI programs to: provide a more streamlined process for service providers and customers; develop enhancements to the incentive structure to include incorporation of a graduated incentive schedule; develop a no-cost direct install component available to moderate-income customers; align eligible measures; and streamline and improve the application and intake process, which includes strengthening the identification and referral of eligible customers from the Utilities to NYSERDA.</p> <p>In July of 2021 the EmPower NY and AHP programs launched a streamlined online and paper application for both programs that includes geographic eligibility for certain low-income areas. In the Fall of 2021 agreements between NYSERDA and the Utilities were executed that enable the Utilities to provide supplemental funding to the EmPower program to increase participation in each service territory.</p>



	<p>During the program design activities, the Program Administrators have engaged with service providers, customers, and other stakeholders to obtain feedback and insights to inform the final program design. NYSERDA and the Utilities worked closely to develop a framework for EmPower+ which will lead to a unified program that is streamlined to create easier access for LMI customers, one access point for contractors seeking incentives, and a robust design to lead the state towards beneficial electrification. This will create cost efficiencies through reduced administrative costs and encourage increased customer participation.</p> <p>In March of 2022, the statewide program instituted many of the planned efficiencies the JMC has worked on including unified measures, forms, and modeling tools across income tiers, alignment with the TRM, and expanding direct install to moderate income customers.</p>
Full Implementation	<p>The merged, streamlined, EmPower+ program workflow will launch in 2023. This program will be administered statewide in close coordination with PSEG-LI and the WAP, HEAP, and local housing programs to optimize the deployment of clean energy investments in the program.</p> <p>In 2022, the HEAT program will expand program eligibility to moderate income customers and test aspects of the EmPower+ incentive structure design to provide learning and refine the program design prior to statewide launch.</p>

***Target Market and Delivery Method***

Market Segment Addressed	<p>Low-income homeowners and renters in 1-4 family homes who meet income eligibility thresholds.</p> <p>In instances where a tenant in a multifamily building is referred for program services, the tenant will be eligible for electrical reduction measures. The building owner will also be encouraged to conduct a more comprehensive upgrade of the building.</p>
Delivery Method	<p>EmPower NY is delivered through a network of approximately 200 weatherization and home performance contractors across New York State, except for Long Island, where HEAT is delivered through several home performance contractor partners.</p> <p>Low-income households may be directly referred into EmPower NY or HEAT by Utilities, community-based organizations, human service providers, and local government.</p>

	<p>Where possible, low-income projects will be coordinated with WAP by participating contractors that are also WAP subgrantees.</p> <p>Outreach for LMI households will be conducted through statewide and local marketing efforts, the NY Energy Advisor website’s marketing campaign, community-based partners, and participating contractors.</p>
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**Eligible Measures and Incentive Structure**

Eligible Measures	<ul style="list-style-type: none"> <li>• Comprehensive home audit</li> <li>• In-home energy education</li> <li>• Building shell improvements (<i>i.e.</i>, insulation, blower-door assisted air sealing, weather stripping)</li> <li>• Electric load reduction (<i>e.g.</i>, refrigerator, freezer, high-efficiency lighting)</li> <li>• Heating, Ventilation, and Air Conditioning (“HVAC”) and mechanical system repairs, tune-ups and replacements.</li> <li>• Domestic Hot Water (“DHW”) improvements and replacements</li> <li>• Controls</li> <li>• Minor health and safety improvements (<i>i.e.</i>, gas leak repairs, smoke and carbon monoxide (“CO”) detectors, combustion safety, venting)</li> <li>• Low-flow water devices</li> </ul> <p><b><i>The HEAT program does not provide any electric saving measures as it is a gas only program but coordinates closely with PSEG-LI’s LMI program.</i></b></p>
Incentive Structure	<p>Low-income (statewide other than for HEAT program): 100% subsidy for all measures up to project cap as outlined in the program guidelines.<sup>83</sup> The HEAT program also pays 100% subsidy for all measures and aims to review projects and utilize other funding resources once they exceed project cap.</p> <p>Moderate-income: currently customers statewide, other than the HEAT program, are eligible for a 50% subsidy up to program caps on eligible measures/work scopes. KEDLI HEAT offers all moderate-income customers a no cost home energy assessment and direct install measures with a 75% subsidy for customers within 61-70% AMI, a 50% subsidy for customers within 71-80% AMI, and a 25% subsidy for customers within 81-99% AMI.</p> <p>The Program Administrators, in consultation with stakeholders, customers, and contractors, are considering a more graduated incentives scale for the EmPower+ program, which will launch in 2023. LMI customers may be eligible for incentives according to a graduated incentive scale, based on household income, with modifications to project cost caps. For all income-eligible customers, direct install services will be provided. The HEAT program</p>

<sup>83</sup> <https://www.nyserda.ny.gov/All-Programs/EmPower-New-York>

	will align incentives with the statewide program and will test aspects of it during the 2022 program year prior to full statewide launch in 2023.
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***Stakeholder / Market Engagement***

Key Partners	<ul style="list-style-type: none"> <li>• NYS Office of Temporary and Disability Assistance – coordinate outreach and funding to HEAP recipients to reduce utility bills</li> <li>• NYS HCR - Combined project with WAP subgrantees and coordinate beneficial electrification strategies for 1-4 family homes.</li> <li>• Departments of Social Services- perform outreach and application intake</li> <li>• Community-based organizations- Coordinate outreach, disaster response, program design</li> <li>• NYS Office for the Aging</li> </ul>
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***Additional Considerations***

Additional Funding	<p>In addition to CEF and NE: NY funds, NYSERDA also incorporates funding from RGGI and HEAP as well as federal funding, where available, to increase the number of households served.</p> <p>NFGDC will bring in additional LMI funding from their SEEP portfolio to support this program.</p> <p>National Grid (KEDLI) will bring in additional funding approved in their most recent rate case for the HEAT program.</p>
GJGNY	<p>No-cost energy audits and low-interest financing are made available under the provisions of the Green Jobs – Green NY Act of 2009. The Program Administrators will coordinate the availability of these services with program incentives to provide customers with the ability to enhance energy upgrades available through the program.</p>

***Implementation Milestones (2022-2024)***

Implementation milestones will be further developed as the Program Administrators evaluate the current set of initiatives. The Program Administrators note that any continuing effects of the COVID-19 pandemic may modify implementation milestones.

Year	Milestone	Status
2022	<ul style="list-style-type: none"> <li>• Improve coordination with other programs (<i>e.g.</i>, HEAP and WAP)</li> <li>• Enhance effectiveness of the EmPower referral process and improve customer conversion rate by conforming to consistent data file submission to NYSERDA</li> <li>• Identify ways to enhance or add measures to the existing EmPower offerings, particularly for gas savings</li> <li>• Contract for new program workflow software and implementation support services</li> <li>• Increase awareness, community outreach and education through coordination with the new Clean Energy Hubs and existing utility outreach programs</li> </ul>	In Progress
	<ul style="list-style-type: none"> <li>• Work with NYS Clean Heat JMC to streamline customer access to both NYS Clean Heat and EmPower with appropriate affordability protections</li> <li>• Outline and seek input on a plan to phase out support for fossil fuel fired equipped in GJGNY audits, financing, and LMI programs to align with Climate Act while preserving energy affordability.</li> </ul>	Planning
2023	<ul style="list-style-type: none"> <li>• Launch the combined, streamlined LMI program- EmPower+</li> </ul>	In Progress
	<ul style="list-style-type: none"> <li>• Increase DAC access to Empower+ by incorporating DAC geographic eligibility and coordinating with regional Clean Energy Hubs on targeted outreach to DACs</li> <li>• Integrate Empower+ and NYS Clean Heat offerings to increase access to incentives for electrification</li> <li>• Pursue opportunities to obtain and incorporate funding from the Inflation Reduction Act into LMI programs</li> </ul>	Planning
2024	<ul style="list-style-type: none"> <li>• Evaluate program performance and optimize design to serve more homes and encourage more contractors to offer efficiency and electrification services through the program</li> <li>• Increase contractor base and expand offerings to meet increased climate goals</li> </ul>	Planning

***Budgets, Benefits and Performance Metrics***

The annual budgets, benefits and performance metrics for this initiative are included in Appendices C and D.

**4.2 Existing Affordable Multifamily Buildings**

Affordable multifamily housing is a key component of the Statewide LMI Portfolio, as a large proportion of LMI customers in New York State live in multifamily buildings. Improving the performance and sustainability of affordable multifamily housing will benefit disadvantaged communities, as required by the Climate Act. As directed in the

2020 NE: NY Order, at least 40% of the portfolio's incremental energy efficiency funds must be directed to affordable multifamily initiatives through 2025.

The Program Administrators are administering a set of initiatives to increase the performance of existing affordable multifamily buildings through comprehensive energy efficiency upgrades and technical support to address the challenges and barriers of adoption for this sector. These initiatives were designed through the collaboration of the Utilities, NYSERDA, and affordable housing agencies. These initiatives were strategically developed to leverage existing programs. For example, FlexTech was leveraged to provide technical assistance for the newly launched AMEEP, and expanded to enable deeper decarbonization measures through, for example, NYSERDA providing additional funds and technical assistance for NYC HPD and NYS HCR preservation programs.

All the initiatives in this section are administered in a complementary approach to ensure multifamily buildings are able to receive services in a holistic manner. In order to promote comprehensive upgrades, it is essential that the Program Administrators design and implement programs to enable buildings to undertake multiple upgrades and understand the initiatives offered to them. This requires close coordination of the Program Administrators to implement.

On November 3, 2021, the Program Administrators launched AMEEP, a new, coordinated statewide program to meet the State's and the Program Administrators' objectives for energy efficiency in this important sector. AMEEP includes a technical assistance offering, which helps building owners inform capital planning to achieve greater energy efficiency savings. AMEEP's design reflects key Portfolio objectives of helping affordable multifamily buildings reduce energy use and costs, increasing operating efficiency and tenant comfort, and contributing to the State's carbon reduction and climate goals.

In addition, the Program Administrators worked closely with affordable housing agencies. The Program Administrators consulted with housing agencies and their developers on the design of AMEEP. In addition, NYSERDA announced creation of multi-year partnerships with NYS HCR and NYC HPD to integrate decarbonization technical assistance support and incentives directly into the housing finance process, while supporting the development of more aggressive sustainability guidelines, new energy savings underwriting guidelines, and training among housing agency staff to position the agencies as leaders in making efficient, electrified housing their standard practice.

Since late 2020, existing building projects have faced challenging market conditions due to supply chain delays, labor shortages, increased materials costs and increased borrowing costs. These market conditions have contributed to construction delays and pauses on new project development. Program Administrators are working with stakeholders to better understand these market challenges and may consider adjustments to programs to facilitate project development and meet program objectives.

**Objectives:**

- Address cost barriers experienced by owners of affordable multifamily properties
- Integrate energy efficiency into the regular investment and financing cycle of affordable multifamily properties
- Improve awareness and access to energy efficient solutions for tenants and building owners of affordable housing
- Provide a simplified experience for owners of affordable multifamily properties that are navigating multiple ratepayer-supported programs
- Deliver benefits to tenants, while improving the overall efficiency of the building
- Address the barrier of split incentives between owner and tenant
- Build capacity among housing agencies to incorporate energy efficiency into affordable multifamily buildings
- Direct at least 40% of the Statewide LMI Portfolio’s incremental energy efficiency funds to affordable multifamily initiatives

**4.2.1 Statewide Existing Affordable Multifamily Programs**

***Affordable Multifamily Energy Efficiency Program***

The new Statewide existing affordable multifamily program, AMEEP, provides a consistent framework across the State such that all existing affordable multifamily building owners, developers, and their representatives have access to financial incentives to plan and make energy efficiency upgrades to their buildings. A key focus of AMEEP is to encourage comprehensive upgrades to achieve deeper savings, while taking advantage of opportunities to reduce administrative costs.

***Multi-Year Affordable Housing Partnerships***

As a complement to AMEEP, Program Administrators have formed multi-year partnerships with state and local affordable housing agencies and public housing authorities, who in turn continue to demonstrate vital leadership on climate action and building decarbonization, in both existing and new construction building stock. NYSERDA and NYS HCR recently announced a transformative partnership called the Clean Energy Initiative (“CEI”), providing CEF funding to support state-of-the-art all-electric affordable

homes and streamline access to technical assistance and electrification funding by integrating these resources directly into NYS HCR’s affordable housing finance applications. Ultimately, NYSERDA will provide \$100M in funding through 2025 to support NYS HCR to advance efficient all-electric new construction and retrofits in affordable housing ahead of proposed code changes and mandates.

In a similar effort, NYSERDA partnered with NYC HPD to create the Retrofit Electrification Pilot, with NYSERDA providing funding to support space heating and cooling and/or domestic hot water electrification for existing multifamily building rehabilitation projects in NYC HPD’s preservation programs and bring the comfort and health benefits of electrification to LMI residents. These partnerships demonstrate scalable models for integrating efficiency and electrification technical assistance and incentives into affordable housing refinancing by giving owners direct access to decarbonization resources and funding as part of their refinancing process.

In 2021, NYSERDA also joined forces with the NYCHA -- the largest public housing authority in the country and the largest landlord in New York City – and NYPA to create the Clean Heat for All Challenge, a heating and cooling industry competition to create a packaged, cold climate heat pump that can be mounted in a window opening and provide comfortable efficient heating and cooling to NYCHA residents on a room-by-room basis. The partnership leverages RGGI funding and technical assistance from NYSERDA, NYPA’s procurement vehicle and project management, and NYCHA’s portfolio size and funding commitment to invest \$250M in a proven solution to advance their electrification agenda.

**Overview**

<p>Status Prior to new Statewide LMI Portfolio Offering</p>	<p>Until the launch of AMEEP in November 2021, existing affordable multifamily buildings were served through utility administered initiatives and NYSERDA administered initiatives. Through the CEF, NYSERDA administered the Multifamily Performance Program (“MPP”), RetrofitNY and Real Time Energy Manager (“RTEM”) throughout the State including territories that have a utility administered multifamily program. MPP offered an energy audit and incentives to assist in the development of a scope of work that would achieve at least 15% projected energy savings. Buildings received a construction completion incentive that was calculated per dwelling unit, and performance incentives were available to projects achieving a minimum of 15% of energy savings. Through MPP, NYSERDA also supported the adoption of Integrated Physical Needs Assessments (“IPNAs”) by supporting housing agencies in their development of IPNAs.</p>
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	<p>Con Edison and National Grid (KEDLI, KEDNY, and NMPC) each offered financial incentives for approved equipment upgrades by measure for affordable multifamily buildings.<sup>84</sup> NYSEG/RG&amp;E introduced an LMI multifamily program mid-year 2020, which was an extension of its existing market rate program, offering free energy audits and low-to no-cost equipment upgrades. In this program, buildings received one incentive at the time of construction completion and the incentive was calculated per equipment installed. Each of these utility programs differed slightly in measures offered and incentive structure. For example, Con Edison implemented an affordable multifamily program for several years, which offered increased incentives over market rate incentives for eligible affordable multifamily buildings. National Grid and NYSEG/RG&amp;E also offered measure-specific incentives for energy efficiency upgrades in multifamily buildings. In addition, the aforementioned utilities offered a Direct Install Program that offered multifamily buildings no-cost installation of easy to install measures in tenant units and common areas.</p> <p>There were strengths and weaknesses to this pre-AMEEP state of the affordable multifamily programs across the State. The utilities that had existing affordable multifamily programs had successful relationships within their market and achieved increasing energy savings year over year. There are significant regional differences, however, in the population of affordable multifamily buildings across the State, which was reflected in these prior utilities’ programs. This also informed the development of AMEEP, which is a statewide framework with some specific elements reflecting regional differences.</p>
Transitional Phase	<p>For this sector, a significant portion of the Transitional Phase has been the transition from the prior Program Administrator administered existing multifamily building programs to AMEEP. The Program Administrators began developing the framework for the new statewide multifamily program in Fall 2020 and focused on the development of AMEEP in 2021, culminating in its market launch in November 2021. The Program Administrators collaborated extensively on the design of AMEEP. This collaboration included reviewing and assessing their separate, existing multifamily LMI programs, and ultimately adopting numerous best practices and optimal elements from these. The Program Administrators similarly assessed possible changes and improvements, opportunities for achieving cost efficiencies, and incorporating key innovations into program design.</p> <p>As the various design possibilities were suggested and considered within Program Administrator discussions, the Program Administrators iteratively solicited input from stakeholders. In 2021, the Program Administrators: held two public stakeholder engagement sessions at</p>

<sup>84</sup> For National Grid, incentives were part of a market-rate program that was also available to LMI customers.



	<p>which the LMI multifamily program was a key focus; met several times with the SAG, a stakeholder group convened by DPS Staff as part of the PM&amp;IP regarding the Statewide LMI portfolio<sup>85</sup>; and engaged in one-on-one interviews with additional stakeholders, including housing agencies, building owners, and energy efficiency providers with significant expertise and experience in multifamily energy efficiency programs in New York State. The Program Administrators carefully reviewed the feedback, key themes of which include that the new program should:</p> <ul style="list-style-type: none"> <li>• Be easy to sell and understand;</li> <li>• Provide incentive clarity;</li> <li>• Have a design that allows for broad participation and flexibility in work scopes;</li> <li>• Drive quality, deep work scopes; and</li> <li>• Eliminate possible barriers for customers</li> </ul> <p>The time, effort, and insight offered by stakeholders was instrumental in developing and iteratively refining AMEEP’s design (as described below and detailed in the AMEEP Program Manual<sup>86</sup>).</p> <p>In developing AMEEP, program design focused on the following key design elements:</p> <ul style="list-style-type: none"> <li>• Measures offered</li> <li>• Incentive structure <ul style="list-style-type: none"> <li>○ Emphasis on creation of an incentive structure that encourages buildings to complete comprehensive upgrades, with flexibility for prescriptive approaches</li> </ul> </li> <li>• Application process</li> <li>• Contractor network</li> <li>• Lead intake and sharing</li> <li>• Opportunities to leverage external program administrators, as discussed in <a href="#">Section 6</a> below, and the investments that are already being conducted for affordable multifamily buildings</li> <li>• Utility coordination in overlapping territories</li> <li>• Structure of Direct Install</li> <li>• Increasing the adoption of IPNAs</li> <li>• Coordination of the incentive-based program with technical assistance offerings. Require building owners to complete energy studies and move forward with making equipment upgrades</li> </ul> <p>In launching AMEEP, the Utilities and NYSERDA coordinated on a statewide transition of programs in the market. As MPP wound down,</p>
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<sup>85</sup> See, NE: NY Proceeding, Commencement of Energy Efficiency & Building Electrification Performance Management & Improvement Process, (filed May 29, 2020.) See also, 2020 NE: NY Order, pp. 60-61.

<sup>86</sup> See, <https://cdnc-dcxprod2-sitecore.azureedge.net/-/media/files/coned/documents/save-energy-money/rebates-incentives-tax-credits/rebates-incentives-for-multifamily-customers/nys-affordable-building/program-manual.pdf?rev=9a1cad1ee94d44e0b08b48fa75c8ee0c&hash=95B37418F77EEF76652B8886CF5F74B7>

NYSERDA and the Utilities organized a strategic overlap period of three months in which both MPP and AMEEP were operational, allowing the market sufficient time to submit final MPP project applications and adjust to the new AMEEP structure.

In addition, the Program Administrators have worked with affordable housing agencies and stakeholders to ensure AMEEP was accessible to regulated affordable properties.

NYSERDA partnered with the housing agencies to develop an approach to directly integrate efficiency program incentives as part of the financing process. This resulted in the launch of the NYSERDA- HPD Retrofit Electrification Pilot to provide owners receiving NYC HPD financing with additional funding to undertake deep efficiency and electrification upgrades as part of their rehabilitation projects. NYSERDA is providing \$24M to support space heating and cooling and/or domestic hot water electrification for existing multifamily building rehabilitation projects in NYC HPD's preservation programs to bring the comfort and health benefits of electrification to roughly 1,200 LMI households.

NYSERDA and NYS HCR announced a partnership called the Clean Energy Initiative ("CEI"), creating a one-stop process for developers to access technical assistance, direct integration of efficiency and electrification funding, and affordable financing, serving both affordable housing new construction and preservation. Since 2021, NYSERDA has allocated \$32.5M to HCR to disperse to affordable housing finance applicants that implement efficient, all-electric new construction and retrofits.

In 2021, NYSERDA announced a partnership with the NYCHA – the largest public housing authority in the country and the largest landlord in New York City – and the NYPA to create the Clean Heat for All Challenge, a heating and cooling industry competition to create a packaged, cold climate heat pump that can be mounted in a window opening and provide comfortable efficient heating and cooling to NYCHA residents on a room-by-room basis. The partnership leverages RGGI funding and technical assistance from NYSERDA, NYPA's procurement vehicle and project management, and NYCHA's portfolio size and funding commitment to invest \$250M in a proven solution to advance their electrification agenda.

In 2021, Con Edison also leveraged and fostered several working relationships to support energy efficiency in multifamily buildings. Con Edison has been meeting regularly with NYCHA to provide additional support for their multifamily projects, and coordinated on work with the New York City Mayor's Office of Climate and Environmental Justice and NYC HPD. Con Edison launched a Local Law 97 limited offering in partnership with NYC HPD and New York City Accelerator, aimed at helping certain buildings comply with the law by implementing the

	<p>necessary prescriptive energy conservation measures. As part of this offering, Con Edison and NYC HPD developed a prescriptive measure package for NYC HPD asset managed buildings greater than 25,000 square feet in size. Incentives for these packages are provided on a dollar per dwelling unit basis based on building vintage. NYC Accelerator is conducting outreach on behalf of this offering. They have developed materials to engage building owners that highlight energy savings and available incentives. Further, Con Edison began partnering with NYC HPD and NYSERDA on the Retrofit Electrification Pilot, helping to coordinate program incentives to fill funding gaps in these projects.</p>
<p>Full Implementation</p>	<p>To a significant degree, the launch of AMEEP into market reflects Full Implementation status for this sector. AMEEP is a single Statewide program that provides a streamlined customer experience throughout the State, with each Utility offering the same program structure. Leads and inquiries are directed to each utility through a common web intake portal, and all the Utilities use the same customer application. Additionally, the participating contractor network requirements and application are the same at each utility. Buildings that fall in overlapping utility service territories only need to submit one application, work with one utility Implementation Contractor as their main point of contact during the project process, and any inspections are performed by a single party. Streamlining administration of the program in this manner has the potential to create cost efficiencies.</p> <p>In addition to coordination among Utilities, the Utilities are coordinating with NYSERDA on technical assistance for AMEEP participants. Customers have the ability to perform a whole-building energy retrofit through AMEEP’s “Comprehensive Pathway.” This pathway requires that the project work scope be guided by an energy audit, which can be completed through Utility coordination with NYSERDA’s FlexTech program, as described in <a href="#">Section 4.2.2</a>. Alternatively, customers may choose to perform single measure upgrades through AMEEP’s “Non-Comprehensive Pathway.” The AMEEP incentive structure is described in more detail in the Eligible Measures and Incentive Structure table, below.</p> <p>While the launch of AMEEP into market reflects Full Implementation status for this sector to a large degree, the Program Administrators are continuing to enhance elements of the program. For example, AMEEP and NYS Clean Heat have been coordinating in an effort to enable complementary incentives between both programs. Further, the Program Administrators are continuing to refine the AMEEP offering based on operational experience and stakeholder feedback, and will continue to work with external agencies that serve affordable multifamily buildings and stakeholders.</p> <p>To achieve full implementation with the housing agencies, NYSERDA will continue to expand its direct funding partnerships with state and local housing agencies to serve more units with efficiency and electrification</p>

	and build capacity among housing agencies and affordable housing development community to build or retrofit all-electric efficient buildings at low or no incremental cost; enhance underwriting practices to capture value of highly efficient, electrified buildings; to reach both new construction and preservation pipelines, and support development of sustainability guidelines that advance the affordability and sustainability goals of Governor Hochul’s 5-year Affordable Housing Plan, and deliver on the State’s climate goals by requiring high-performance all-electric retrofits by 2027. <sup>87</sup>
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**Target Market and Delivery Method**

Market Segment Addressed	Affordable multifamily buildings, tenants living in affordable multifamily buildings, affordable multifamily building owners, housing agencies, service providers, participating contractors, and other parties working with affordable multifamily buildings and building owners.
Delivery Method	The Utilities are the AMEEP Administrators, with NYSERDA providing energy audits and market development elements. Energy audits are completed by NYSERDA-approved energy providers in the FlexTech Consultant network and Multifamily Building Solutions Network and are available statewide. Two Implementation Contractors administer AMEEP, one for upstate National Grid, NFGDC, and NYSEG and RG&E, and one for the other Utilities. Eligible participating contractors complete installations of eligible measures. Utilities coordinate in overlapping utility service territories, so that customers work with only one implementation contractor in executing projects. The Program Administrators continue to examine the current state of implementation across the state to identify areas for improvement to reduce administrative inefficiencies, increase enrollment, and promote comprehensive upgrades. In addition, NYSERDA provides funding directly to housing agencies (e.g., NYS HCR and NYC HPD) to serve affordable housing developers as part of the financing process.

**Eligible Measures and Incentive Structure**

Eligible Measures	Measures include but are not limited to: <ul style="list-style-type: none"> <li>● Lighting</li> <li>● Building envelope</li> <li>● HVAC</li> <li>● Elevator modernization</li> <li>● Variable frequency drive</li> <li>● Blower fan</li> <li>● Circulator pump</li> <li>● Energy management systems</li> <li>● Boiler</li> </ul>
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<sup>87</sup> <https://hcr.ny.gov/sustainability-guidelines>

	<ul style="list-style-type: none"> <li>• Pipe insulation</li> <li>• Water and space heating</li> <li>• Steam traps</li> <li>• Boiler clean and tune</li> <li>• Light emitting diode (“LED”) lighting measures</li> <li>• Faucet aerator</li> <li>• Showerhead</li> </ul>
Incentive Structure	<p>AMEEP is designed to maximize energy savings and lower costs to tenants and owners of affordable multifamily buildings by encouraging comprehensive building upgrades while providing project flexibility. AMEEP includes two program pathways: (1) a “Comprehensive Pathway,” which encourages whole-building energy retrofits; and (2) a “Non-Comprehensive Pathway” for customers who are interested in smaller, measure-level upgrades.</p> <p>Incentives for all Comprehensive Pathway projects are calculated using a “points” system, which allocates points to energy efficiency measures based on measure savings and policy objectives, and establishes points-achievement tiers that result in increased incentive rates. A minimum of 100 points needs to be met for a project to be classified as a Comprehensive project; a project is designated as Tier 1 – with the corresponding incentive level – if it achieves between 100 and 149 points. If a project reaches 150 or more points, it is categorized as a Tier 2 project and is eligible to receive a greater incentive. Comprehensive incentives are awarded on a dollar per dwelling unit basis. An energy audit is required as part of the Comprehensive Pathway to help identify the scope of work, and incentives are available to offset the cost of the audit through the FlexTech Program.</p> <p>Customers opting for the Non-Comprehensive Pathway are able to perform measure-level energy efficiency upgrades. They may select to complete prescriptive and custom measures, and can participate in the in-unit direct install program, without undergoing an energy audit. Incentives in this pathway are awarded on a dollar per equipment or dollar per savings basis.</p> <p>For affordable housing partnerships including Retrofit Electrification pilot with NYC HPD, and the Clean Energy Initiative with NYS HCR, NYSERDA is providing a per-dwelling unit incentive based on package of efficiency and/or electrification measures.</p>

***Stakeholder / Market Engagement***

Key Partners	NYSERDA and Con Edison have worked with NYS HCR and NYC HPD to offer complementary strategies to the market. This coordination will continue.
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	<p>Con Edison maintains ongoing monthly conversations with the NYC Mayor's Office of Climate and Environmental Justice (specifically, the NYC Accelerator staff) to coordinate on key energy efficiency topics and current program delivery methods.</p> <p>Program Administrators will continue to work directly with housing agencies to incorporate funding into preservation projects to offset incremental costs associated with higher performance.</p> <p>Con Edison is working with their local Public Housing Authorities (<i>i.e.</i>, New York City Housing Authority (“NYCHA”), Westchester County Housing Authority (“WCHA”)) that are not covered under the System Benefit Charge (“SBC”) to provide incentives for gas energy efficiency programs.</p> <p>NYSERDA partnered with NYCHA and the NYPA to create the Clean Heat for All Challenge, a heating and cooling industry competition to create a packaged, cold climate heat pump that can be mounted in a window opening and provide comfortable efficient heating and cooling to NYCHA residents on a room-by-room basis. The partnership leverages RGGI funding and technical assistance from NYSERDA, NYPA’s procurement vehicle and project management, and NYCHA’s portfolio size and funding commitment to invest \$250M in a proven solution to advance their electrification agenda.</p> <p>Additional stakeholder involvement occurred throughout 2020 and 2021, and continues to occur in 2022, as the Statewide Existing Affordable Multifamily framework is implemented. This stakeholder involvement takes place in biannual stakeholder sessions as well as targeted solicitation of feedback and input from stakeholders to guide continuing operation and calibration of AMEEP.</p>
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**Implementation Milestones (2022-2024)**

Implementation milestones will be further developed as the Program Administrators work towards Full Implementation of the new Statewide Existing Affordable Multifamily Program. The Program Administrators note that any continuing effects of the COVID-19 pandemic may modify implementation milestones.

Year	Milestone	Status
2022	<ul style="list-style-type: none"> <li>Develop Program Administrator processes for statewide operations of AMEEP (<i>e.g.</i>, document updates) and launch webinar series to engage Participating Contractors and Industry Partners by Q2</li> </ul>	Complete
	<ul style="list-style-type: none"> <li>Identify additional areas to streamline administration of program</li> </ul>	In Progress

	<ul style="list-style-type: none"> <li>• Coordinate AMEEP incentives with NYS Clean Heat and align release to market with NYS Clean Heat announcement cycles for program changes</li> <li>• Along with NYCHA and NYPA, NYSERDA will select winning manufacturer(s) that responded to Clean Heat for All packaged window heat pump challenge RFP</li> <li>• Provide technical assistance and staffing resources to assist with capacity-building at NYS HCR and NYC HPD</li> </ul>	
2023	<ul style="list-style-type: none"> <li>• Organize stakeholder interviews on AMEEP design and operations based on the first full year of operation to get feedback to guide analysis and potential program changes, and adapt program eligibility to reflect final DAC criteria</li> <li>• Review program objectives and operations to enable alignment with potential policy changes scheduled to take place in 2022 and 2023 (<i>e.g.</i>, NE: NY Interim Review, Climate Act definition of providing benefits to DACs)</li> <li>• Issue initial small purchase order for and install packaged window heat pumps in NYCHA properties as part of ‘demonstration phase’ of Clean Heat for All initiative</li> </ul>	Future
2024	<ul style="list-style-type: none"> <li>• Study creation of measure packages for comprehensive retrofits by building typology based on data from AMEEP participants, and assess ability to offer packages as part of AMEEP</li> <li>• Assess viability of packaged window heat pumps as an effective electrification approach/model for NYCHA housing and broader NY multifamily market</li> <li>• Pending success of demonstration phase, initiate broader implementation phase of Clean Heat for All initiative and install additional packaged window heat pumps</li> </ul>	Future

***Budgets, Benefits and Performance Metrics***

The annual budgets, benefits and performance metrics for this initiative are included in Appendices C and D.

**4.2.2 Technical Assistance for Affordable Multifamily Buildings**

Increasing the performance of existing affordable multifamily buildings at scale requires support beyond direct incentives for building owners, as technical and information gaps can limit the ability for housing agencies, financiers, and other housing intermediaries from supporting energy efficiency upgrades. Technical support, in the form of engineering studies and IPNAs, can help building owners maximize available program incentives to inform capital planning and achieve greater energy savings. Housing

agencies often do not have in-house technical capacity or resources to drive increased energy performance of their portfolios, and access to performance data is key to advancing the underwriting of clean energy projects. This section highlights the various approaches to supporting the adoption of energy efficiency through the provision of technical support and resources to the affordable multifamily ecosystem.

**Objectives:**

- Conduct comprehensive energy audits for existing affordable and market rate multifamily housing utilizing vetted energy service providers
- Subsidize energy audit costs to incentivize market adoption of conducting such audits
- Develop report that covers: the relevant building information (*e.g.*, building’s energy usage, annual energy costs by fuel type, rate tariff); evaluated measure findings, which includes but is not limited to a description of what was evaluated, analysis results, proposed conditions, and recommendations and reasons for recommendations; economic analysis of evaluated measures; and additional benefits, such as greenhouse gas reduction, Local Law compliance, and environmental benefits. The report is intended to inform decision makers on how to reduce energy costs and incorporate clean energy into their capital planning.
- Establish a scope of work that would qualify for the comprehensive pathway of AMEEP.
- Conduct assessment of electrification and electrification-ready opportunities.

**Overview**

<p>Status Prior to new Statewide LMI Portfolio Offering</p>	<p>NYSERDA administered the FlexTech program which offers a cost share model for building owners to receive funding to conduct an energy study on their building. NYSERDA also offered energy studies and support to build capacity of housing agencies to perform IPNAs, as part of the MPP program. Utilities that offer multifamily programs do not have financial incentives for technical assistance.</p>
<p>Transitional Phase</p>	<p>In the development of AMEEP, the Program Administrators assessed and sought feedback on the optimal approach and design elements for technical assistance, with the focus on NYSERDA’s existing offerings, such as FlexTech. Specific areas of design focus included:</p> <ul style="list-style-type: none"> <li>• Providing buildings with a consistent, main point of contact for AMEEP when performing technical assistance and subsequently installing measures in the program</li> <li>• Leveraging NYSERDA-vetted energy service providers to conduct technical assistance to ensure quality of assessments</li> <li>• Partnering technical assistance with incentive program offerings; offer increased subsidies on technical assistance for Comprehensive</li> </ul>



	<p>projects going through the utility administered affordable multifamily incentive programs</p> <p>Con Edison, as part of its Rate Plan,<sup>88</sup> is required to offer technical assistance funding for affordable multifamily building owners. As part of AMEEP, Con Edison is working with the framework of FlexTech, which is leveraged for technical assistance statewide, to implement its Rate Plan requirements. As a transitional offering, while AMEEP was under development in 2021 and the coordination with FlexTech was not yet implemented, Con Edison implemented technical assistance for its customers in the form of gas facility surveys and full facility assessments. Through the gas facility survey, an audit was performed and a report was provided that evaluated gas opportunities. These included boilers, boiler clean &amp; tune, EMS, pipe insulation, steam traps, and building envelope. Through the full facility assessments, a whole building facility audit was performed. A report was then provided that covered equipment details, occupancy, HVAC systems, air delivery systems, boiler systems, motors, pumps, ventilation systems, lighting, building management, and building envelope. The report also provided a list of suggested energy conservation measures (ECMs). Following these surveys and assessments, the customer was required to move forward with two of three free gas measures. This offering closed at the completion of 2021, as which point the launch of AMEEP enabled streamlined coordination of technical assistance for Con Edison customers via FlexTech.</p>
Full Implementation	<p>Funding for building energy audits that identify energy efficiency opportunities and develop an initial scope of work for Comprehensive projects are provided through NYSERDA’s FlexTech program. NYSERDA manages payment for technical assistance energy audits. NYSERDA also oversees workforce development and the training of energy service providers through the FlexTech Consultant Network and the Multifamily Building Solutions Network.</p> <p>AMEEP requires technical assistance in order to qualify for higher incentives available in the Comprehensive Pathway. Technical assistance helps building owners plan projects to achieve greater energy efficiency savings and simultaneously maximize program incentive opportunities. The audits completed should be ASHRAE Level I+ as defined by NYSERDA’s FlexTech Program, or higher (e.g., ASHRAE Level II, IPNA).<sup>89</sup> Multifamily building owners and their representatives in need of a study can work with their utility point of contact, who will coordinate with NYSERDA to arrange</p>

<sup>88</sup> Case No. 19-E-0065, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consol. Edison Co. of New York, Inc. for Electric Serv., et al.*, Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plan, (issued January 16, 2020). p. 77-78.

<sup>89</sup> See, <https://cdnc-dcxprod2-sitecore.azureedge.net/-/media/files/coned/documents/save-energy-money/rebates-incentives-tax-credits/rebates-incentives-for-multifamily-customers/nys-affordable-building/program-manual.pdf?rev=9a1cad1ee94d44e0b08b48fa75c8ee0c&hash=95B37418F77EEF76652B8886CF5F74B7>

	<p>funding for the study. The owner and their representative will select a service provider from NYSERDA’s FlexTech or Multifamily Building Solutions network of consultants to perform the audit, and to help in developing a project work scope. NYSERDA will provide a 50% subsidy for the study at completion of the audit, helping to ease the cost burden on the affordable buildings. Afterwards, the project will be executed under the utility-administered incentive program. When a Notice to Proceed has been issued for the building to begin construction under AMEEP, NYSERDA will subsidize an additional 25% of the study for an overall maximum cost share of 75%. This two-part subsidy structure is aimed at providing customers with an additional incentive to follow through on project construction.</p> <p>Additionally, the Program Administrators will support housing agencies to provide support and capacity development to help increase building performance requirements for regulated properties and to assess results from IPNAs. NYSERDA will also work with housing agencies and financiers to identify gaps in available performance data and will invest in the development of data sets that can be used to aid in determinations on underwriting and build confidence among financiers and housing agencies. Additionally, NYSERDA will provide technical assistance and funding for NYC HPD and NYS HCR preservation programs to drive greater energy performance.</p> <p>With NYC HPD, NYSERDA has developed a pilot to incentivize and scale energy efficiency and electrification retrofits. NYSERDA will provide gap funding to cover the incremental amount of funding needed for electrification over the standard NYC HPD energy performance improvement. The pilot will also include pre-defined scope and a dedicated Technical Assistance Provider to promote and enable electrification. Through this direct injection of incentives model, NYSERDA and NYC HPD are streamlining the incentive delivery process, will strengthen understanding and internal capabilities within NYC HPD and test replicability and scalability of this pilot.</p> <p>With NYS HCR, NYSERDA is providing funds to support electrification and deep envelope improvements and providing housing developers with streamlined access to technical assistance and affordable housing incentive opportunities. The funding and pilot model creates a one-stop process for developers to access building decarbonization- focused incentives as part of NYS HCR’s application for affordable housing development support.</p> <p>With both NYS HCR and NYC HPD, NYSERDA is funding technical assistance contractors to work with the agencies to build internal capacity and assist owner teams.</p>
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### ***Target Market and Delivery Method***

Market Segment Addressed	Multifamily buildings with 5 or more dwelling units that meet the definition of affordability, where at least 25% of the households are at or below 80% of the State Median Income or Area Median Income, whichever is higher.  Additionally, housing agencies (NYC HPD, New York City Housing Development Corporation (“HDC”), NYS HCR), energy service providers that specialize in multifamily housing, tenants living in affordable housing, and other parties working with affordable multifamily buildings and building owners.
Delivery Method	Utilize framework of NYSERDA consultants; coordination with housing agencies to provide necessary support

### ***Eligible Measures and Incentive Structure***

Eligible Study Areas	<ul style="list-style-type: none"> <li>• Energy efficiency technical analyses</li> <li>• Investigations of an advanced technology or system</li> <li>• Creation of a long-term energy plan</li> <li>• Investigation of deep energy savings</li> <li>• Investigation of Clean Heating and Cooling Systems including Air Source Heat Pumps, Ground Source Heat Pumps, Variable Refrigerant Flow, and Solar Heating and Cooling</li> </ul>
Incentive Structure	Cost-share up to 75% of cost of technical assistance services

### ***Stakeholder / Market Engagement***

Key Partners	Housing agencies ( <i>e.g.</i> , NYS HCR, NYC HPD, Public Housing Authorities), service providers, and other housing intermediaries
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### ***Implementation Milestones (2022-2023)***

Implementation milestones will be further developed as the Program Administrators evaluate the current set of initiatives. The Program Administrators note that any continuing effects of the COVID-19 pandemic may modify implementation milestones.

Year	Milestone	Status
2022	<ul style="list-style-type: none"> <li>• Engage with NYS HCR colleagues, affordable housing owners and developers to refine integration of technical assistance within housing financing application processes</li> </ul>	In Progress

	<ul style="list-style-type: none"> <li>Encourage energy service providers to include electrification and/or electrification-readiness as part of any subsidized technical assistance scopes to support long-term decarbonization efforts</li> </ul>	
	<ul style="list-style-type: none"> <li>Update program eligibility to increase access in disadvantaged communities</li> </ul>	Planning
2023	<ul style="list-style-type: none"> <li>Provide technical assistance resources to housing agencies to build in-house capacity to assess and support sustainability as part of core mission</li> </ul>	In Progress
	<ul style="list-style-type: none"> <li>Require consideration of electrification and/or electrification-readiness as part of any subsidized technical assistance to enable long-term building decarbonization efforts</li> </ul>	Planning

***Budgets, Benefits and Performance Metrics***

The annual budgets, benefits and performance metrics for this initiative are included in Appendices C and D.

**4.2.3 RetrofitNY<sup>90</sup>**

New York State’s existing affordable multifamily buildings offer great potential for energy savings and greenhouse gas emissions reductions. Traditional energy efficiency programs targeted at multifamily buildings typically reduce on-site energy consumption by up to 30%. Greater building performance, on the order of 70% of on-site energy consumption reductions, can be achieved by undertaking a deep energy retrofit, which consists of superinsulation of the shell, installing HVAC equipment, and lighting, among other upgrades. Despite the significant benefits of conducting deep energy retrofits on multifamily buildings, there are several barriers to scaling deep energy retrofits in the affordable multifamily building market segment. The deep energy retrofits currently being done are complex, not replicable, and are not cost effective.

Many affordable building owners face capital constraints that result in tradeoffs between basic structural and operational improvements against improvements to energy performance, making it difficult to undertake significant energy efficiency improvements. In addition, deep energy retrofits can be highly disruptive for tenants, making it difficult for building owners to undertake such a project because most multifamily affordable

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<sup>90</sup> RetrofitNY was approved as part of the Clean Energy Fund LMI Chapter, and with the transition to the Statewide LMI Portfolio, is now included in this Implementation Plan.

housing units in the State are occupied. Retrofitting occupied buildings on a large scale requires innovative solutions that enable deep energy retrofits while the tenants remain in their apartments. However, cost effective solutions that can be implemented on a large scale currently do not exist in the United States.

Affordable multifamily housing is a logical starting point for the implementation of RetrofitNY because the regulated housing portfolio in New York State is large and provides for a natural aggregation of similarly constructed buildings, relative to market rate building stock, which tends to be more diverse. Approximately 660,000 affordable housing units in the state are either publicly owned or subsidized by regulatory or financing agencies, presenting a unique opportunity to create demand for retrofit solutions by aggregating a large number of units to be renovated.

Since its public launch in 2018, RetrofitNY has identified key barriers to scaling deep energy retrofits in New York State and beyond. Key major barriers include underinvestment, industry fragmentation, high customer acquisition costs, and misallocation of risks. These current market failures drive up costs and hamper rapid decarbonization in the building sector.

To achieve broad adoption of deep energy retrofits and address key barriers, RetrofitNY has two main program goals: (1) drive down the costs of installed solutions, and (2) lower building owner upfront capital needs.

Substantial cost reduction is a function of deliberate investment. RetrofitNY has identified the major barriers to investment in this space and is bringing solutions to the market to eliminate these barriers and facilitate the deployment of investment capital to support needed market development. Cost drivers targeted by RetrofitNY include:

- Transaction costs
- Business model and value chain costs
- Customer acquisition costs
- Installation costs
- Solution design
- Component fabrication costs
- Financing costs

Lowering building owner upfront costs will greatly increase adoption rates of deep energy retrofit solutions. Sizing the market opportunity and pricing the value of deep energy retrofits, which includes avoided costs, new sources of revenue, and reduced risk of the retrofit solution is key to reducing upfront capital requirements.

RetrofitNY market interventions to reduce upfront capital requirements focus on the following areas:

- Developing financial mechanisms that assign value to outcomes
- Reducing performance and technology risk for financial providers
- Lower nonpayment risk for financial providers
- Remove frictions for financial providers to enter this market
- Developing standard performance measurements for risk reduction, humidity levels, longevity, noise dampening, and air quality
- Developing markets for risk reduction, humidity levels, longevity, noise dampening, air quality, carbon savings

The RetrofitNY program will lead or support the following market interventions to realize an end-state solution and develop a retrofit value chain that is both time and resource efficient:

- Warranty for offsite manufactured whole building retrofit solutions
- Qualify retrofit companies capable of turnkey delivery of replicable solutions
- Marketplace and customer acquisition platform
- Support the development of financial products and market mechanisms that effectively value the outcomes of fully electrified buildings
- Loan loss reserve fund (or first loss reserve) for whole building retrofit solution ecosystem
- Product testing and tech transfer support
- Coordination on R&D investment areas
- Coordination on workforce development initiatives
- Reduce insurance costs for the construction and operation of carbon neutral buildings
- Engagement with investors
- Direct financial support for retrofit projects

Addressing the barriers and market development areas laid out above will result in a self-sustaining carbon neutral buildings retrofit market. The innovative market strategy under RetrofitNY is designed to achieve scale in the fastest time scale, which would take multiple decades under a business-as-usual approach.

**Objectives:**

- Develop simplified, scalable solutions for conducting deep energy retrofits in occupied multifamily units
- Create a self-sustaining market for deep-energy retrofits in New York State to ensure the mass implementation of deep-energy retrofit solutions that approach or achieve carbon neutrality across prevalent building types and different housing market segments
- Ensure that affordable housing is prioritized when it comes to developing solutions for enabling the adoption of whole building retrofit solutions

- Assist the architecture, engineering, technology, and construction industry in the development of innovative solutions to significantly improve energy performance
- Assist with the development of financing mechanisms and new business models enabling increased project feasibility and uptake by building owners.

**Overview**

Activities	<p>To create a self-sustaining marketplace for the deep-energy retrofits of tenanted multifamily buildings in New York State, NYSERDA will:</p> <ol style="list-style-type: none"> <li>1. Define the Criteria Needed for Retrofits <ul style="list-style-type: none"> <li>• In cooperation with Affordable Housing and LMI stakeholders, NYSERDA will determine basic criteria to be met by retrofit packages to be created by the industry.</li> <li>• Criteria could include: very high level of building energy performance; enhanced health, comfort and building aesthetic; limited disruption to tenants during construction; cost effectiveness; guaranteed energy savings over a long period of time.</li> </ul> </li> <li>2. Create Demand by Aggregating a Large Number of Units to be Renovated <ul style="list-style-type: none"> <li>• Through direct engagement of Public Housing Authorities and owners of large portfolios or affordable buildings, NYSERDA will create the demand side of the market by aggregating a large number of units, starting with the affordable housing sector where regulatory agencies can play a facilitating role, that will commit to implementing the solutions.</li> <li>• NYSERDA will work with NYS HCR, NYC HPD and HDC as well as other agencies, Public Housing Authorities, and private owners of large portfolio across the state to secure the appropriate demand.</li> </ul> </li> <li>3. Organize and Run a Design-Build Process <ul style="list-style-type: none"> <li>• The potential for a large, new market will motivate the industry to answer competitive solicitations and engage in several rounds of a design-build and implementation process focused on predetermined buildings from affordable housing portfolios in New York.</li> <li>• The solutions will be selected and tested through implementation on the specified buildings. Initial demonstration projects will be implemented on building types that are highly representative of the affordable housing building stock (in terms of size, age, construction materials, etc.) located in the State.</li> <li>• NYSERDA will carefully monitor implementation and results in terms of energy savings, construction costs, comfort, and disruption to tenants during construction.</li> <li>• Using lessons learned from the prior round of installations, NYSERDA will organize subsequent funding rounds to improve the solutions until they meet all predefined criteria and adapt them to</li> </ul> </li> </ol>
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additional building types. The number of funding rounds will be based on the progress of the solution designs.

- NYSERDA will fund part of the incremental development costs for the selected solutions: Part of the typical capital improvements currently funded or financed by Affordable Housing agencies for the preservation of multifamily buildings very often include energy related improvements such as facade and roof repairs, as well as boiler and window replacement. The funds dedicated to these improvements can be reallocated to cover part of costs of the solutions designed through the design-build process. NYSERDA will also seek to utilize existing and new financing products to finance part of the incremental costs with the energy savings. NYSERDA will then fund the share of the incremental costs not covered by financing products available at the time of the retrofit. NYSERDA's financial contribution will decrease over time as the cost of the solutions is reduced and more financing products become available, until the market is self-sustaining.

In parallel to the development of technical solutions, NYSERDA will help create an enabling environment for large scale implementation of the designed solutions through activities 4, 5, 6, 7 and 8.

4. Create a clear and transparent mechanism for stakeholders interested in developing and piloting retrofit solutions
  - NYSERDA will set up and administer a set of rolling Request for Qualifications ("RFQL") to target solution providers, component manufacturers and building owners
  - The RFQLs will be used to communicate market needs and assess viability of interested stakeholders
5. Support the development of solution providers that will serve to streamline the design and installation process acting as a turn-key entity to building owners
  - Due to market fragmentation, there are many drivers that contribute to inflated costs on projects. A turn-key provider will achieve cost compression by investing in technologies to drive down costs and develop long term relationships with supply chain partners and installer networks.
6. Develop Supply Chain of High Efficiency Components
  - Building components and systems required for a deep energy retrofit are not always readily available in New York and are often imported from Europe. NYSERDA will work with manufacturers and distributors of the components and systems used in the implemented deep energy retrofit solutions to ensure their availability in the New York market.



	<ul style="list-style-type: none"> <li>• NYSERDA will work with national partners, such as Dept of Energy, to support R&amp;D efforts for needed technologies to scale deep energy retrofits.</li> <li>• NYSERDA will assess and qualify major relevant building components, such as mechanical systems, panelized building envelope products and monitoring systems for use in whole building retrofit solutions.</li> </ul> <p>7. Develop Financial Solutions to Finance the Retrofits</p> <ul style="list-style-type: none"> <li>• In conjunction with interested lenders, NYSERDA will collaborate with stakeholders from the financing industry to develop private sector financing products that can be integrated with the existing affordable housing financing programs to provide project level support.</li> </ul> <p>8. Support Development of Insurance and or Warranty Products to Facilitate Market Scaling</p> <ul style="list-style-type: none"> <li>• To scale whole building retrofits, robust warranty products are needed to shift technology risks away from building owners to allow for rapid adoption and scale up.</li> <li>• NYSERDA will engage industry stakeholders to scope and support development of a warranty product that solution providers can issue to building owners that adopt these whole building retrofit solutions.</li> </ul> <p>9. Work with national partners to drive market development of a regional collaborative for deep energy retrofit projects</p> <ul style="list-style-type: none"> <li>• NYSERDA will engage national partners, such as Dept. of Energy, National non-profits, and other interested states to disseminate the learnings of the program to support development of similar programs in other states.</li> </ul>
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<p>Status Prior to new Statewide LMI Portfolio Offering</p>	<p>Traditional energy efficiency programs targeted at multifamily buildings typically reduce on-site energy consumption by up to 30%. Greater building performance, on the order of 70% of on-site energy consumption reductions, cannot be achieved in a cost-effective way. Integrated components, such as cost-effective panelized envelope solutions and multi-functional HVAC units, are needed for scale-up do not exist in the NYS market. There are several barriers to scaling deep energy retrofits in the affordable multifamily building market segment, such as high cost and difficulty of financing for building owners. The deep energy retrofits currently being done are complex, not replicable, and are not cost-effective.</p>
<p>Transitional Phase</p>	<p>To create a self-sustaining marketplace for the deep-energy retrofits of tenanted multifamily buildings in New York State, NYSERDA will:</p> <ol style="list-style-type: none"> <li>1. Defined the Criteria Needed for Retrofits <ul style="list-style-type: none"> <li>• In cooperation with Affordable Housing and LMI stakeholders, NYSERDA will determine basic criteria to be met by retrofit packages to be created by the industry.</li> <li>• Criteria could include: very high level of building energy performance; enhanced health, comfort and building aesthetic; limited disruption to tenants during construction; cost effectiveness; guaranteed energy savings over a long period of time.</li> </ul> </li> <li>2. Create Demand by Aggregating a Large Number of Units to be Renovated <ul style="list-style-type: none"> <li>• Through direct engagement of Public Housing Authorities and owners of large portfolios or affordable buildings, NYSERDA will create the demand side of the market by aggregating a large number of units, starting with the affordable housing sector where regulatory agencies can play a facilitating role, that will commit to implementing the solutions.</li> <li>• NYSERDA will work with NYS HCR, NYC HPD and the HDC as well as other agencies, Public Housing Authorities, and private owners of large portfolio across the state to secure the appropriate demand.</li> </ul> </li> <li>3. Organize and Run a Design-Build Process <ul style="list-style-type: none"> <li>• The potential for a large, new market will motivate the industry to answer competitive solicitations and engage in several rounds of a design-build and implementation process focused on predetermined buildings from affordable housing portfolios in New York.</li> <li>• The solutions will be selected and tested through implementation on the specified buildings. Initial demonstration projects will be implemented on building types that are highly representative of the affordable housing building stock (in terms of size, age, construction materials, etc.) located in the State.</li> </ul> </li> </ol>

	<ul style="list-style-type: none"> <li>• NYSERDA will carefully monitor implementation and results in terms of energy savings, construction costs, comfort, and disruption to tenants during construction.</li> <li>• Using lessons learned from the prior round of installations, NYSERDA will organize subsequent funding rounds to improve the solutions until they meet all predefined criteria and adapt them to additional building types. The number of funding rounds will be based on the progress of the solution designs.</li> <li>• NYSERDA will fund part of the incremental development costs for the selected solutions: Part of the typical capital improvements currently funded or financed by Affordable Housing agencies for the preservation of multifamily buildings very often include energy related improvements such as facade and roof repairs, as well as boiler and window replacement. The funds dedicated to these improvements can be reallocated to cover part of costs of the solutions designed through the design-build process. NYSERDA will also seek to utilize existing and new financing products to finance part of the incremental costs with the energy savings. NYSERDA will then fund the share of the incremental costs not covered by financing products available at the time of the retrofit. NYSERDA's financial contribution will decrease over time as the cost of the solutions is reduced and more financing products become available, until the market is self-sustaining.</li> </ul> <p>4. Create a clear and transparent mechanism for stakeholders interested in developing and piloting retrofit solutions</p> <ul style="list-style-type: none"> <li>• NYSERDA will set up and administer a set of rolling RFQL to target solution providers, component manufacturers and building owners</li> <li>• The RFQLs will be used to communicate market needs and assess viability of interested stakeholders</li> </ul> <p>5. Support the development of solution providers that will serve to streamline the design and installation process acting as a turn-key entity to building owners</p> <ul style="list-style-type: none"> <li>• Due to market fragmentation, there are many drivers that contribute to inflated costs on projects. A turn-key provider will achieve cost compression by investing in technologies to drive down costs and develop long term relationships with supply chain partners and installer networks.</li> </ul> <p>6. Work with national partners to drive market development of a regional collaborative for deep energy retrofit projects</p> <ul style="list-style-type: none"> <li>• NYSERDA will engage national partners, such as Dept. of Energy, National non-profits, and other interested states to disseminate the learnings of the program to support development of similar programs in other states.</li> </ul>
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Full Implementation	<p>For an end market for deep energy retrofits to be viable, the following programmatic elements need to exist.</p> <ol style="list-style-type: none"> <li>1. Develop Supply Chain of High Efficiency Components <ul style="list-style-type: none"> <li>• Building components and systems required for a deep energy retrofit are not always readily available in New York and are often imported from Europe. NYSERDA will work with manufacturers and distributors of the components and systems used in the implemented deep energy retrofit solutions to ensure their availability in the New York market.</li> <li>• NYSERDA will work with national partners, such as Dept of Energy, to support R&amp;D efforts for needed technologies to scale deep energy retrofits.</li> <li>• NYSERDA will assess and qualify major relevant building components, such as mechanical systems, panelized building envelope products and monitoring systems for use in whole building retrofit solutions.</li> </ul> </li> <li>2. Develop Financial Solutions to Finance the Retrofits <ul style="list-style-type: none"> <li>• In conjunction with interested lenders, NYSERDA will collaborate with stakeholders from the financing industry to develop private sector financing products that can be integrated with the existing affordable housing financing programs to provide project level support.</li> </ul> </li> <li>3. Support Development of Insurance and or Warranty Products to Facilitate Market Scaling <ul style="list-style-type: none"> <li>• To scale whole building retrofits, robust warranty products are needed to shift technology risks away from building owners to allow for rapid adoption and scale up.</li> <li>• NYSERDA will engage industry stakeholders to scope and support development of a warranty product that solution providers can issue to building owners that adopt these whole building retrofit solutions.</li> </ul> </li> </ol>
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***Target Market and Delivery Method***

Market Segment Addressed	Affordable housing buildings owned by Public Housing Authorities, and privately owned multifamily affordable housing buildings regulated, financed or subsidized by affordable housing agencies or housing finance agencies such as NYS HCR, NYC HPD, the New York State Housing Finance Agency, and HDC. NYSERDA will subsequently expand its target market to other building sectors containing typologies that are a good fit for the solutions developed.
Delivery Method	The administration of RetrofitNY includes:

	<ul style="list-style-type: none"> <li>• The development of high-level criteria that the architecture, engineering, technology, and construction industry will need to meet to create the retrofit solutions.</li> <li>• Creating the demand side of a new market for deep energy retrofits by aggregating a large number of units that will commit to implement the solutions to be designed.</li> <li>• Qualifying solution providers, component manufacturers and building owners that would be eligible for demonstration pilots through periodic funding rounds.</li> <li>• Organizing a design-build process to select and test the developed solutions through demonstration pilots. Using lessons learned from funding rounds, NYSERDA will organize subsequent rounds to improve the solutions until they meet all predefined criteria and adapt them to additional building types. To ensure replicability, scale and impact, NYSERDA is analyzing New York's affordable housing portfolios to identify the most prevalent building typologies in the state.</li> <li>• Facilitating innovative financing by interested private sector lenders to leverage energy and operational savings to provide additional capital to buildings.</li> <li>• Hosting investor groups to bring needed investment to companies with technologies that can drive cost compression of solutions and developing the New York supply chain for high efficiency building components.</li> <li>• Promoting broad adoption of these deep-retrofit solutions as preservation strategies for the affordable housing stock and encourage their adoption across the multifamily housing market.</li> </ul>
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***Stakeholder / Market Engagement***

Key Partners	<ul style="list-style-type: none"> <li>• Public Housing Authorities</li> <li>• NYS Affordable Housing regulatory agencies including NYS HCR and NYC HPD</li> <li>• Housing Finance Agencies including New York State Housing Finance Agency, and HDC</li> <li>• Private building owners</li> <li>• Builders, developers, architects, suppliers, engineers, building scientists, building technology firms and other service providers</li> <li>• Private financing companies, insurance and re-insurance companies, and energy service companies</li> <li>• Department of Energy</li> <li>• Other regional entities interested in scaling deep energy retrofits</li> </ul>
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### ***Implementation Milestones (2022-2025)***

Year	Milestone	Status
2023	<ul style="list-style-type: none"><li>• Integration of retrofit solutions in the public housing authorities' strategies</li></ul>	In Progress
2024	<ul style="list-style-type: none"><li>• Integration of retrofit solutions into regulated affordable housing preservation strategies</li></ul>	Future
2025	<ul style="list-style-type: none"><li>• Deliver retrofit solutions that are cost effective such that NYSERDA subsidies are no longer necessary</li><li>• Develop a market for building components and systems required for deep energy retrofits are readily available in the New York market</li><li>• Support creation of financing solutions to facilitate building owners' uptake of the retrofit these solutions at scale</li></ul>	Future

### ***Budgets, Benefits and Performance Metrics***

The annual budgets, benefits and performance metrics for this initiative are included in Appendices C and D.

### **4.3 Affordable New Construction**

High performance and carbon neutral new construction can significantly reduce the energy consumption and related costs in the residential sector than would otherwise be expected, delivering not just energy bill savings for residents and building owners, but also improving the health and comfort of residents and providing resilient and sustainable housing stock that delivers long term energy savings and carbon emission reductions. Despite the many benefits, only a small portion of residential new construction is achieving carbon neutral or net zero energy performance. This can be attributed to several market factors including constraints with current building and design practices, potential for higher incremental costs, and limited availability of performance data and off-the-shelf design and build specifications. There is also a general lack of awareness of the long term financial, health, and environmental benefits associated with these buildings. The Program Administrators recognize current market constraints and will continue to seek to scale the design and construction of new and substantial renovations in the affordable housing market by working with market partners and stakeholders within the new construction and affordable housing sector. This includes the network of housing agencies, builders and developers, architects, engineers, and financiers to address the market barriers associated with building to higher levels of energy efficiency. The Program Administrators have converted their

market engagement strategy to deliver incentives and services directly within the public housing agencies, and will likely limit, reduce, or even end other financial incentives or technical support in the market.

**Objectives:**

- Improve the building performance through reduction of site energy use of affordable new construction, with the goal of carbon neutral performance
- Support trades and developers to advance engineering, design, construction practices, and performance verification
- Identify and test replicable models for achieving high performance in new affordable housing
- Advance integrated design solutions that are replicable, with a focus on cost optimization
- Continue to support New York State and New York City housing agencies, funding authorities, and municipalities in their efforts to secure the most efficient, durable, resilient, and healthy housing, based on technical and economic feasibility, while striving to maximize effective use of the resources available to achieve those goals
- Increase information about, awareness of, and demand for deep energy savings and carbon neutral construction for new and gut rehab of single family and multifamily buildings

**Overview**

Current Status	<p>NYSERDA administered the Affordable New Construction Housing Program across the State, which provides:</p> <ul style="list-style-type: none"> <li>• Technical and financial support to public housing agencies</li> <li>• Technical assistance to projects seeking to achieve high performance energy efficiency buildings</li> <li>• Incentives to housing developers and builders, with incentive levels based on the performance of the building</li> <li>• Quality Assurance (“QA”) services through third parties such as Residential Energy Services Network (“RESNET”)-accredited Rating Quality Assurance Providers, Multifamily Review Organizations (“MRO”), or qualified certifiers/verifiers to one of the Passive House standards</li> </ul> <p>In addition, NYSERDA administered the Buildings of Excellence competition, which seeks to identify replicable models for the design, construction, and renovation of affordable housing.</p>
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Transitional Phase	In 2022, the affordable new construction activities funded through the CEF (including Standard Offer and Buildings of Excellence) will be offered while incentive programs are fully transitioned to Housing Agencies to be provided within existing financing and capital stack offerings. In addition, the Program Administrators will explore the development of prescriptive packages of measures that can drive higher performance, <i>i.e.</i> , more energy efficiency and reduced energy use, in new and renovated affordable housing. Where the Utilities and NYSERDA will be offering incentives, the Program Administrators will coordinate to streamline program participation as necessary and ensure the greatest impact of ratepayer funding.
Full Implementation	In 2022-2025, the affordable new construction offerings will include: <ul style="list-style-type: none"> <li>• Incentives for carbon neutral affordable new construction to increase the performance of residential buildings</li> <li>• Market development support that includes integrated design and construction protocols, and the development of data and information resources to document success stories and lessons learned that can be used to provide cost/benefit justification will continue</li> </ul>

***Target Market and Delivery Method***

Market Segment Addressed	Builders, developers, owners, architects, engineers, energy modelers and other construction entities for new buildings or substantial renovation of affordable single family or multifamily buildings
Delivery Method	Incentives will be provided to builders and developers. However, the Program Administrators will also seek opportunities to integrate incentives into the financing of affordable new construction by working with housing agencies. Technical assistance will be provided to housing agencies, architects, engineers, builders, and developers.

***Eligible Measures and Incentive Structure***

Eligible Measures	The Affordable New Construction initiative assesses the performance of the building. Envelope, decarbonized HVAC, appliances, and efficient lighting measures are all eligible for inclusion in incentivized projects.
Incentive Structure	Incentives will be provided by NYSERDA to affordable new construction and renovation projects based on the level of energy savings achieved, as outlined in the program documents. The Buildings of Excellence competition provides incentives for innovative design and construction of zero carbon emitting multifamily buildings. Housing Agencies will offer Clean Energy Incentives for new construction and renovation projects that meet efficiency and decarbonization performance criteria.

***Stakeholder / Market Engagement***



Key Partners	<p>NYSERDA has worked with NYS HCR and NYC HPD to offer complementary strategies to the market. This coordination will continue.</p> <p>Program Administrators will continue to work directly with housing agencies to incorporate funding into new construction projects to offset incremental costs associated with higher performance.</p> <p>NYSERDA has developed channel partner relationships with organizations that deliver professional development and educational opportunities to the market to facilitate the dissemination of best practices and cost compression opportunities to builders, developers, energy modelers and consultants.</p> <p>Additional stakeholder involvement occurred throughout 2020 and 2021, and continues to occur in 2022, with additional key partners including community development corporations (“CDCs”), developers, builders, architects, engineers, housing intermediaries, non-profit builders, Home Energy Rating System (“HERS”) raters.</p>
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***Implementation Milestones (2022-2025)***

Implementation milestones will be further developed as the Program Administrators evaluate the current set of initiatives. The Program Administrators note that any continuing effects of the COVID-19 pandemic may modify implementation milestones.

Year	Milestone	Status
2022	<ul style="list-style-type: none"> <li>• Launch of high-performance demonstrations and competitions</li> <li>• Incorporation of lessons learned from previous demonstrations and competitions</li> <li>• Launch of Round 3 of the Buildings of Excellence Multifamily Design Competition</li> </ul>	Complete
	<ul style="list-style-type: none"> <li>• Expand integrated funding with State and local affordable housing agencies</li> </ul>	In Progress
2023	<ul style="list-style-type: none"> <li>• Continue expanded integration with public housing agencies</li> <li>• Utilize data and successful solution sets from decarbonization projects to deploy information through Channel Partners, conferences and other general awareness activities</li> </ul>	In Progress
2024	<ul style="list-style-type: none"> <li>• Continue expanded integration with public housing agencies</li> <li>• Utilize data and successful solution sets from decarbonization projects to deploy information through channel partners, conferences, and other general awareness activities</li> </ul>	Future
2025	<ul style="list-style-type: none"> <li>• Continue expanded integration with public housing agencies</li> <li>• Utilize data and successful solution sets from decarbonization projects to deploy information through channel partners, conferences, and other general awareness activities</li> </ul>	Future

***Budgets, Benefits and Performance Metrics***

The annual budgets, benefits and performance metrics for this initiative are included in Appendices C and D.

#### 4.4 Pilots and Demonstrations<sup>91</sup>

Opportunities for increasing access to energy efficiency solutions and improving energy affordability are ever-evolving, with new technologies, applications, business and delivery models, and opportunities for cross-sector coordination emerging on a regular basis. To continuously improve the programs and offerings under the Statewide LMI Portfolio, the Program Administrators will continue to incorporate the piloting and demonstration of new technologies and approaches for serving LMI customers and communities.

Through pilot activities, the Program administrators seek to:

1. Identify and test technologies and/or approaches for addressing the barriers to improving energy efficiency in the LMI market segment;
2. Test approaches that can scale the adoption of energy efficiency solutions in the LMI market segment;
3. Prove models for improving the delivery of energy efficiency solutions across the LMI market segment that can reduce administrative burden for customers and administrators; and
4. Determine innovative approaches for improving awareness and access to energy efficiency solutions for LMI or otherwise disadvantaged communities.

The Program Administrators fund LMI pilots and demonstrations through the CEF, with the expectation that learnings will be communicated and deployed at a larger scale. For instance, a novel approach for delivering energy efficiency services to customers may require testing before being broadly adopted. Through the CEF, this approach for service delivery can be tested and, if successful, be rolled out for deployment through the Utilities. To identify pilot opportunities, the Program Administrators will continue to leverage existing vehicles for discovering possible pilot concepts, such as REV Connect or through the issuance of solicitations seeking innovative solutions. Decisions on pilot priorities and the sharing of information between Program Administrators will occur within the LMI JMC. In addition, the Program Administrators will report annually on pilot activities, including results and planning. For example, the 2021 Annual Report noted achievements including the development of educational materials aimed at LMI customers and building owners who have recently installed heat pumps, to support behavioral change and proper system operations.

Ongoing work is continuing to evaluate lessons learned from research, analysis, pilots, and incentive offerings. The Program Administrators expect to develop and launch LMI-focused pilot activities during 2022.

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<sup>91</sup> In general, the sections of this Implementation Plan use a similar template in presenting information. The content in certain sections does not readily conform to this template – notably [Section 4.4 Pilots and Demonstrations](#) and [Section 4.5 Beneficial Electrification in LMI Homes](#); therefore, these sections use a more typical prose presentation.

### ***Budgets, Benefits and Performance Metrics***

The annual budgets, benefits and performance metrics for this initiative are included in Appendices C and D.

#### **4.5 Beneficial Electrification in LMI Homes**

Given that approximately 30% of the State’s greenhouse gas emissions come from heating and cooling of buildings, the Climate Act’s goal of a carbon neutral economy by 2050 requires a major investment and shift in focus to homes that are heated through energy efficient and electrically powered technologies. Such a transition is referred to as *beneficial electrification*, meaning that transitioning to electric will reduce emissions of greenhouse gases and other pollutants.<sup>92</sup> Heat pumps represent the most efficient commercially available solution to electrify space heating, cooling, and domestic hot water heaters.

However, electrification in the LMI sector presents unique challenges and economic and institutional barriers. In markets where natural gas is much less expensive than electricity, for example, homes switching from gas-fired boilers or furnaces to heat pumps risk increasing utility bills for LMI customers. Tenants in rental housing face the potential for new monthly utility bills should a heat pump retrofit result in shifting costs from heating fuel (typically not paid by tenants) to electricity costs (typically paid by tenants). Heat pumps are not yet integrated into existing benefits programs providing energy-related support to income-qualified households, such as HEAP and WAP.

On the other hand, electrification offers potential health and other benefits to at-risk residents. Heat pumps can provide both heating and cooling services, presenting additional value to homes that previously had limited or no cooling systems. Through reductions in on-site combustion, electrification has been shown to reduce indoor pollutants that exacerbate respiratory illness. As such, investments in beneficial electrification in the LMI market segment as part of this Statewide LMI Portfolio seek to maintain energy affordability and consumer protections, while providing these benefits and increasing access to clean energy solutions for LMI communities, households, and building owners.

As articulated in the NYS Clean Heat filing in 2020,<sup>93</sup> NYSERDA has allocated \$30 million<sup>94</sup> of its \$250 million Clean Heating and Cooling Investment Plan for 2020-2025 to market

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<sup>92</sup> <https://www.raonline.org/wp-content/uploads/2018/06/6-19-2018-RAP-BE-Principles2.pdf>.

<sup>93</sup> See, NE: NY Proceeding, NYS Clean Heat: Statewide Heat Pump Program Implementation Plan (filed March 16, 2020 and updated May 29, 2020), Appendix A.

<sup>94</sup> In addition to the \$30 million investment in beneficial electrification represented here, NYSERDA is investing an additional \$1 million as part of this work under the CEF.

interventions that provide clean heating and cooling solutions to the statewide LMI market segment, in four areas:

- ***Research and analysis:***  
Conduct market studies to inform NYSERDA and other market actors about barriers to electrification and ways to mitigate these with targeted solutions and best practices across various building types, as well as strategies to maintain affordability, all of which will inform pilot and demonstration efforts
- ***Pilots and demonstrations:***  
Identify and fund potentially replicable and scalable models for LMI heat pump adoption that reduce known market and institutional barriers in critical LMI segments and provide data and examples that boost investor confidence
- ***Short-term incentives:***  
Provide short-term statewide standard offer incentives that are combinable with other utility and government incentives to promote incorporation of heat pumps into low-income weatherization and affordable housing energy efficiency projects. These incentives will identify approximately 1,500 LMI homes and apartments that have undergone heat pump conversions, from which to collect data and other learnings.
- ***Consumer education:***  
Develop educational materials to help homeowners, building owners, and property managers operate and maintain heat pump systems optimally, in order to increase the impact and benefit of the heat pump installation

Of the above activities, NYSERDA has recently completed a research study characterizing the LMI housing market statewide, identifying promising market segments for targeted electrification efforts including recommendations for program and other interventions to support implementation. NYSERDA has also spent down its short-term incentives budget in the single-family sector, also known as the Heat Pump Demonstration Study, and expects to have all multifamily funding committed by the end of 2022. Residents and building owners of these projects are being provided educational materials developed under the \$30 million budget. Projects from both sectors will be included in an evaluation study that kicked off in early 2022. Early learnings from the evaluation will be incorporated into existing programs in coordination with DPS and the Utilities.

In 2022, Program Administrators will continue to coordinate on these efforts to advance beneficial electrification in the LMI market segment, with a particular focus on developing a cohesive framework for maintaining energy affordability while moving to electrification. This effort will continue to inform long term investments in beneficial electrification for LMI homeowners and tenants in affordable housing. To encourage

beneficial electrification specifically in existing affordable multifamily buildings, the Program Administrators have been and will continue to coordinate between AMEEP and NYS Clean Heat. See [Section 4.2.1](#) for more details.

As noted in the 2021 Annual Report, 2021 achievements include the design and launch of one-page brochures for both 1-4 family homes and multifamily buildings, providing operational guidance for heat pump end users and building owners. Brochures were provided to participants in the LMI Heat Pump Adder Pilot.

***Implementation Milestones (2022-2024)***

Implementation milestones will be further developed as the Program Administrators evaluate the current set of initiatives. The Program Administrators note that any continuing effects of the COVID-19 pandemic may modify implementation milestones.

Year	Milestone	Status
2022	<ul style="list-style-type: none"> <li>• Launch evaluation and market insights study based on projects completed through short-term incentive offering incentive offerings</li> <li>• Publish LMI chapter within Building Electrification Roadmap, outlining key policy approaches to scale LMI electrification through 2030</li> <li>• Partner with sister State agencies to aggressively shift existing benefit programs into alignment with the State’s housing decarbonization targets, especially LIHEAP, WAP, and the State’s Energy Affordability Policy and Utility Energy Assistance Programs</li> <li>• Conduct research and analysis on electrification of affordable housing, to develop recommendations for protecting tenants from heating cost shifts</li> </ul>	In Progress
	<ul style="list-style-type: none"> <li>• Continue programmatic support for LMI heat pump installations, with a focus on segments that present the least technical difficulty and/or the most favorable return on investment, including buildings using delivered fuels and electric resistance heat, buildings with inefficient gas furnaces or boilers, and multifamily buildings with steam distribution systems</li> <li>• Design and launch a program offering supporting rapid response heat pump conversions in situations where existing fossil heating systems are at or near failure</li> <li>• Launch additional program support for LMI multifamily building owners seeking to integrate electrification into their portfolio, by providing wraparound services for guidance on capital planning, identifying best-fit technology solutions, employee training, project scoping, how to overcome hurdles related to existing subsidy</li> </ul>	Planning

	<p>agreements and tenant leases, and identifying incentives and other financial support for installing heat pumps</p> <ul style="list-style-type: none"> <li>• Design pilot(s) supporting DHW electrification conversions for multifamily buildings</li> <li>• Launch research focused on policy and regulatory initiatives that can further enable heat pump adoption in LMI housing</li> <li>• Conduct stakeholder engagement to develop promising approaches for community- and place-based interventions supporting heat pump deployment in LMI and Disadvantaged Communities</li> <li>• Develop and launch additional educational materials for LMI customers and building owners, including short how-to videos and other multimedia offerings</li> <li>• In collaboration with DPS and the Utilities, identify the scope of and pathway to increased support for pre-electrification make-ready work such as electrical panel upgrades</li> </ul>	
2023	<ul style="list-style-type: none"> <li>• Publish interim learnings from the single family LMI heat pump demonstration study (short term incentives)</li> <li>• Publish interim learnings from the multifamily LMI heat pump demonstrations study (short term incentives)</li> <li>• Revise program rules to incorporate learnings from affordability and consumer protections research</li> </ul>	Future
2024	<ul style="list-style-type: none"> <li>• Publish interim learnings from pilots and demonstrations</li> <li>• Revise program rules to incorporate affordability and consumer protections learnings from research and evaluation of real-world projects</li> </ul>	Future

#### 4.6 Additional LMI Initiatives

In addition to the Statewide LMI Portfolio initiatives, NYSERDA administers other initiatives to increase access to clean energy solutions and improve energy affordability for LMI residents and communities as part of the Clean Energy Fund Market Development Portfolio (“CEF Market Development Portfolio”).

##### 4.6.1 New York State Healthy Homes Value-Based Payment Pilot

The Healthy Homes Value-Based Payment (“VBP”) Pilot seeks to develop a framework that allows New York’s managed care organizations (“MCO”) to fund residential healthy homes interventions<sup>95</sup> as part of their value-based payment arrangements with

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<sup>95</sup> A residential healthy homes intervention combines energy efficiency and weatherization measures (e.g., insulation and air sealing) with measures that address persistent respiratory health conditions such as

healthcare providers within the Medicaid Healthcare Delivery System.<sup>96</sup> By validating impacts such as healthcare cost savings and benefits to residents, and by providing market development support, including specification of services and guidance related to VBP contracting, the Healthy Homes Pilot facilitates the adoption of healthy homes treatments by MCOs as part of their Medicaid VBP Arrangements that incorporate social determinants of health. Adopting this approach addresses avoidable medical costs associated with respiratory conditions such as asthma and also household injury, while encouraging third-party capital investment in residential energy efficiency through MCO adoption of healthy homes interventions within the VBP social determinants of health framework after the completion of the Pilot.

Approved in 2019, the Pilot is currently in the field, taking place during 2021-2024, with NYSERDA and NYS DOH collaborating to implement healthy homes interventions in 500 Medicaid member homes and jointly evaluating the associated reduction in Medicaid cost savings and benefits for residents. Responsibilities for each agency include:

- NYSERDA
  - Fund Pilot activities, advise intervention planning related to energy and housing measures, facilitate and manage energy/housing services included in the Pilot, and assume responsibility for data collection and evaluation activities related to energy measures/outcomes
  - Provide market support intended to prepare the existing network of energy efficiency and residential improvement contractors to implement healthy homes interventions as well as provide guidance related to the VBP SDH contracting process
- NY State Department of Health (“DOH”)
  - Office of Health Insurance Programs will secure MCO participation in the Pilot and oversee all VBP contracting activities.

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asthma (*e.g.*, ventilation, moisture/mold mitigation, carpet removal), and includes additional measures aimed at home injury prevention (smoke and CO alarms, stair repair, electrical outlet covers). When implemented together, these interventions can improve occupant health, reduce energy bills and healthcare costs, and improve the comfort and safety of a home.

<sup>96</sup> New York State Medicaid has transitioned the managed care healthcare delivery system from a fee-for-service to a VBP model that links healthcare provider performance and reimbursement through a pre-determined set of value metrics. Under the VBP model, MCOs (*i.e.*, healthcare plans such as Empire Blue Cross Blue Shield) enter into arrangements with healthcare providers or provider networks. To support local investment in activities that address social determinants of health (“SDH”), two of three VBP arrangement levels require incorporation of a CBO engaging in work focused on SDH. Among the five social determinants of health categories established within the VBP system, the Neighborhoods and Environment category includes “substandard housing” as a determinant and includes funded interventions and standard metrics associated with healthy homes interventions within the established SDH Intervention Menu. The substandard housing determinant places energy efficiency and weatherization measures, when incorporated within a healthy homes intervention, within the DOH value-based payment model.



- Office of Public Health will advise Pilot intervention planning related to asthma trigger reduction measures and asthma care management services, facilitate and manage direct health services included in the Pilot, and assume responsibility for data collection and evaluation activities related to health measures/outcomes
- Center for Environmental Health will advise Pilot intervention planning and evaluation activities related to home injury prevention measures

NYSERDA and the NYS DOH targeted the Pilot launch for late 2020, but due to complications of the COVID-19 pandemic, field launch was delayed until 2021. The Pilot successfully launched in the field in Q1 2022 with Medicaid members being enrolled for healthy homes services. However, Pilot-participating managed care organizations, nursing and CHW service providers, and NYSERDA-participating contractors continue to manage challenges to enrolling eligible Medicaid members, obtaining full consent from interested eligible members, and maintaining engagement and continuity of services with those households who are fully consented, which has resulted in a longer than expected timeline for Pilot enrollment and field work. As of Q3 of 2022, NYSERDA and NYS DOH continue to address these complications and will modify Pilot parameters to facilitate Pilot benefits and learnings and to ensure appropriate stewardship of budgeted funds. Effective Q1 2023, NYSERDA and NYS DOH will expand Pilot eligibility to include Medicaid members who are not currently associated with Pilot VBP arrangements to increase the number of Medicaid member households that can be served over the next year. The Pilot schedule may need to be further amended due to current and potential future impacts of the COVID-19 pandemic. The budget and impacts for the NYS Healthy Homes VBP Pilot can be found in [Appendix D](#).

**Objectives:**

- Develop a framework that allows New York’s MCOs to fund residential healthy homes interventions in partnership with energy/residential improvement contractors as part of their value-based payment arrangements with healthcare providers within the Medicaid Healthcare Delivery System
- Validate healthcare cost savings and benefits to residents—including energy, health, and safety—through evaluation undertaken in partnership with NYS Department of Health
- Support residential market preparedness for incorporation of healthy homes interventions into the Medicaid Healthcare Delivery System standard business practice, including specification of services and guidance related to VBP contracting
- Encourage third-party capital investment in residential energy efficiency with MCO adoption of healthy homes interventions supportive of addressing social determinants of health through VBP beyond the Pilot

**Overview**

<p>Status Prior to new Statewide LMI Portfolio Offering</p>	<p>In New York State, the Medicaid transition to a VBP framework, along with an existing infrastructure to deliver healthy homes services, provides a window of opportunity for healthy homes interventions to be considered a fundable healthcare expense. To aid in the VBP transition, DOH is required to administer pilots in cooperation with MCOs to test VBP models incorporating work addressing social determinants of health such as substandard housing. There is a current network of over 200 energy efficiency contractors in New York State, including more than 50 weatherization sub-grantees, who meet the conditions necessary to provide Medicaid services under VBP Level 2 and 3 Arrangements.</p> <p>In 2019, NYSERDA conducted a feasibility study to explore the potential for developing an integrated energy, housing, and health service delivery model for LMI customers in New York. The feasibility study assesses the statewide infrastructure available to deliver an integrated approach, assesses available funding and identifies alternative sources of funding that can be used for integrated energy, housing, and health projects, and provides recommendations for how to quantify and validate the health benefits and healthcare cost savings associated with healthy homes interventions. Information from the feasibility outcomes informed the Pilot’s partnership approach and design.</p>
<p>Transitional Phase</p>	<p>The Pilot’s interim process learnings demonstrate a path for New York’s MCOs to fund residential healthy homes interventions as part of their value-based payment arrangements with healthcare providers within the Medicaid Healthcare Delivery System. Interim Pilot outcomes confirm the benefits of MCO investment in the demonstrated approach. Market support guidance clarifies the partnerships and infrastructure needed to replicate the model.</p>
<p>Full Implementation</p>	<p>The Pilot demonstration, market support guidance, and associated evaluation activities, undertaken in partnership with NYS DOH, provide market actors with information intended to stimulate market uptake. Adopting the intervention approach addresses avoidable medical costs associated with respiratory conditions such as asthma and also household injury, while simultaneously facilitating third-party capital investment in residential energy efficiency. Validated healthcare cost savings, return on investment, and benefits to residents—including energy, health, and safety—encourages MCO adoption of healthy homes interventions within the VBP social determinants of health framework after the completion of the Pilot.</p>

**Target Market and Delivery Method**

<p>Market Segment Addressed</p>	<ul style="list-style-type: none"> <li>• Managed care organizations (<i>i.e.</i>, health plans) operate within the Medicaid Healthcare Delivery System, contracting with healthcare service providers within the value-based payment framework to provide clinical care and other health-related services to Medicaid members</li> <li>• Energy efficiency/weatherization contractors provide energy efficiency and health and safety services and subcontract for additional environmental trigger reduction services, as needed, in residential dwellings within a given region</li> <li>• Health service provider networks (<i>e.g.</i>, physicians, hospitals, nursing and community health worker agencies) operate within the Medicaid Healthcare Delivery System to provide health services such as clinical care, in-home education, and referrals to community-based resources that address social determinants of health</li> <li>• Residents/customers (<i>i.e.</i>, Pilot participants that are high Medicaid utilizers) follow their clinical care plans and participate as necessary in the coordination of health service and dwelling service interventions</li> </ul>
<p>Delivery Method</p>	<ul style="list-style-type: none"> <li>• NYSERDA implements the Pilot in cooperation with the NYS DOH Office of Health Insurance Program, Office of Public Health, and Center for Environmental Health according to the responsibilities outlined in the introduction of <a href="#">Section 4.6.1</a></li> <li>• Participating MCOs identify eligible members and conduct outreach to potential participant households</li> <li>• The Pilot intervention’s dwelling-based services are provided by NYSERDA-participating residential contractors qualified through a NYSERDA Request for Qualifications</li> <li>• The Pilot intervention’s health services are provided by registered nurses and community health workers with specialized training who are affiliated with agencies that are partnered with participating MCOs through value-based payment arrangements</li> <li>• Program administration/implementation and technical assistance are provided through existing NYSERDA and DOH program operations infrastructure</li> </ul>

**Eligible Measures and Incentive Structure**

<p>Eligible Measures</p>	<p>Full intervention measures include:</p> <ul style="list-style-type: none"> <li>• Residential energy and environmental assessment</li> <li>• Energy efficiency measures (<i>e.g.</i>, envelope improvements, electric load reduction, heating system repair/replacement)</li> <li>• Environmental trigger reduction measures (<i>e.g.</i>, mold remediation, carpet removal, integrated pest management, ventilation)</li> <li>• Household injury prevention measures (<i>e.g.</i>, smoke alarms, carbon monoxide detectors, stair/railing repair, bathtub safety bar installation)</li> </ul>
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	<ul style="list-style-type: none"> <li>• Home skilled nursing visits and community health worker support (e.g., in-home education related to asthma self-management and medication adherence, supportive products, and coordination across providers)</li> <li>• Resident education, guidance regarding community resources, and post-intervention follow-up</li> </ul>
Incentive Structure	<ul style="list-style-type: none"> <li>• All intervention services are provided at no cost to a Pilot-participating household.</li> <li>• Intervention dwelling-based services utilize an incentive structure based on existing NYSEDA residential programs (e.g., EmPower NY)</li> <li>• For planning purposes, average cost per project was estimated at approximately \$12,000, with flexibility in per-project cost determined according to scope of work evaluated by program staff</li> <li>• Additional allergen reduction products provided to Pilot participating households are valued at approximately \$250 per household, facilitated through a contract with American Lung Association</li> </ul>

**Stakeholder / Market Engagement**

Key Partners	<ul style="list-style-type: none"> <li>• NYSEDA has worked closely with the NYS DOH Office of Health Insurance Programs (inclusive of Medicaid), Office of Public Health, and Center for Environmental Health to identify the Pilot opportunity and position it in the most beneficial way for both NYSEDA and DOH.</li> <li>• In coordination with NYS DOH, NYSEDA has engaged with MCO executive staff who expressed interest in incorporating healthy homes interventions into their existing Value-Based Payment Arrangements or entering into new Arrangements based on the need for healthy homes services among their Medicaid members.</li> <li>• NYSEDA engaged representatives of the residential energy efficiency industry—including private contractors and weatherization subgrantees, local housing organizations, community-based organizations, and philanthropy on this specific Pilot opportunity and have received universal support for this Pilot work.</li> <li>• In coordination with New York State Department of Public Service, NYSEDA hosted seven stakeholder forums in 2018 to discuss barriers and opportunities to increase energy efficiency and access to clean energy solutions for LMI residents. The need for health and safety improvements was a primary barrier raised by stakeholders.</li> </ul>
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**Key Milestones (2022-2025)**

Implementation milestones are noted below. The Program Administrators note that any continuing effects of the COVID-19 pandemic may modify implementation milestones.

Year	Milestone	Status
2022	<ul style="list-style-type: none"> <li>Complete value-based payment participation toolkits for MCO/VBP providers and community-based organizations</li> </ul>	In Progress
2023	<ul style="list-style-type: none"> <li>Commence interim reporting on Year One intervention implementation process</li> </ul>	Planning
2024	<ul style="list-style-type: none"> <li>Complete draft of the full evaluation report</li> </ul>	Planning

## 5. Customer Awareness, Outreach & Engagement

Awareness and education initiatives play a crucial role in creating lasting effects from energy efficiency and energy affordability programs among LMI customers. Historically, LMI customers have been understood to be hard to reach for a number of reasons, including cultural diversity, unwillingness of homeowners to participate in programs, lack of awareness of and importance attributed to energy efficiency and clean energy technologies, lack of access to capital to invest in projects, and the challenges in managing day-to-day expenses with limited resources. The success of the Statewide LMI Portfolio depends on a successful customer awareness, outreach and engagement campaign. To address this, the Program Administrators have and will continue to design and implement strategies to overcome the challenges of engaging LMI customers and affordable property owners.

Utilities continue to identify supplemental activities to support LMI initiatives. These include distribution activities through food banks and other LMI distribution activities that also cross-promote EmPower NY and AMEEP. These programs are shown in the Budgets and Benefits tables within the Customer Awareness, Outreach and Engagement Activities section and those that are active are defined in more detail in the Annual Report.

Customer Awareness, Outreach & Engagement initiatives seek to identify, address, and include solutions to overcoming barriers to engaging LMI customers and other stakeholders, which may have impeded customer participation in current and future initiatives. These engagement initiatives will seek to:

- Raise Customer Awareness About Portfolio Offerings**

In order for the Portfolio to be successful, LMI customers need to be made aware of the initiatives and services. The Program Administrators recognize the diversity of LMI New Yorkers and are focused on establishing an outreach campaign that is

inclusive. To achieve this, community partners will continue to be engaged to help assist in raising customer awareness of the benefits of participation.

- **Motivate Customers to Take Action**

Once customers are made aware of initiatives and services for which they may qualify, the next step is to engage customers in taking action. Messaging has been designed to help customers understand the participation process and benefits of taking action.

- **Provide Easy Access to Participation**

The initiatives will continue to be designed with ease of customer application and participation in mind. Contractor information will be made available quickly for those customers seeking assistance after an application is submitted for one or more initiatives.

Through multiple delivery channels, the Program Administrators continue to deliver initiatives that address the overall strategic development and coordination of Customer Awareness, Outreach and Engagement initiatives. These initiatives continue to build on existing program experience and provide a comprehensive and integrated statewide approach that includes the following key initiatives:

1. LMI Portfolio Marketing

- Statewide branding, including an initial marketing campaign launched in February 2022
- Centralized NY Energy Advisor website providing online information on energy efficiency and clean energy, financial assistance, and information on how to learn about and participate in the Portfolio offerings
- Branded hard-copy program outreach and informational materials to complement the online NY Energy Advisor website
- Delivery of community-based marketing and paid advertising

2. Community-Based Outreach, Education, and Engagement Partnerships

- An enhanced network of statewide, community-based partners to leverage the customer outreach and engagement capabilities of LMI stakeholder organizations and contractors
- Community Energy Engagement Program (“CEEP”) and Regional Clean Energy Hubs

3. Community-Based Customer Engagement Initiatives

- Delivery of community-based partnerships that combine distribution of low-cost energy efficiency measures with education about energy efficiency and clean energy and information on how to participate in other Portfolio programs

- Neighborhood-based delivery model

This comprehensive approach will continue to allow the Program Administrators to reach residents and communities with opportunities for improving energy affordability, accessing clean energy solutions, improving awareness and education of clean energy opportunities, connecting with essential services,<sup>97</sup> and otherwise accessing the full range of benefits of the clean energy economy.

The following sections provide further information on the featured elements listed above.

### 5.1 LMI Portfolio Marketing

Statewide LMI Portfolio marketing includes four broad elements: (1) statewide branding; (2) the NY Energy Advisor website; (3) branded hard-copy program outreach and informational materials to complement the online NY Energy Advisor website; and (4) delivery of community-based marketing and paid advertising.

#### **Statewide Branding**

Statewide branding for the Portfolio has been developed by the Program Administrators to provide a consistent foundation for marketing and engagement activities. Just as the evolution of appropriately harmonized statewide program design elements can increase effectiveness in program delivery by reducing confusion, statewide branding provides more consistent messaging and increased awareness of the Statewide LMI Portfolio. Statewide branding efforts leading customers and affordable housing owners to initiatives and services will contribute to the success of the Portfolio. Statewide branding will be used in conjunction with localized marketing implemented by the Utilities in their respective territories.

Key considerations in effective statewide branding include development of a clear, concise message as to what is being offered, where to find the offerings, who is offering them, who qualifies for the offerings, and the value of participation.

The Program Administrators launched the initial full paid marketing campaign for the NY Energy Advisor in early 2022. 2022 will be used as a benchmark year to set measurable metrics for future years. The marketing campaign will be calibrated, when necessary, based on results from metric evaluation. Materials will be adjusted and updated based on evaluating paid media, stakeholder, and customer feedback. By coordinating on

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<sup>97</sup> These are services outside of the LMI initiative that facilitate participation in the initiative, which may be referred to as “wraparound.” For example, a customer may need a new roof in order to qualify for attic insulation under the EmPower NY initiative and receives the new roof from a community program that funds such repairs.

statewide branding and marketing campaigns, the Program Administrators have created cost efficiencies in increasing awareness of the Portfolio.

### **NY Energy Advisor**

In 2021, the Program Administrators developed and launched a web-based customer hub platform, called NY Energy Advisor, to provide streamlined, easy access to information about LMI initiatives and services for LMI customers, affordable multifamily property owners and managers, contractors, and stakeholders throughout the state. The NY Energy Advisor is designed to provide clear, consistent, and easy-to-find information on relevant LMI programs and services, including energy efficiency, renewable energy, and energy education materials. This is expected to reduce customer, contractor, and stakeholder confusion. The NY Energy Advisor website will continue to evolve over time into an effective and trusted source for those who use it. This will ideally improve customer satisfaction, Portfolio awareness, and program participation.

The costs for marketing, advertising, consumer perception/awareness surveys, and maintenance of the NY Energy Advisor are shared by the Program Administrators. The co-funding agreement to pay for these costs was based on the approved cost sharing method used by the Technical Resource Manual (“TRM”) Committee.<sup>98</sup> As NYSERDA is not included in the TRM cost sharing agreement, NYSERDA’s share will be based on its percent of the Implementation Plan budget. The Utilities’ cost share will be the remaining amount prorated among the Utilities as outlined in the TRM Management Plan.

An agreement was developed and executed between NYSERDA and each of the Utilities that delineated the process for reviewing details related to the marketing and maintenance of NY Energy Advisor. NYSERDA will continue to take the lead with marketing and maintenance, engaging a contractor to provide the necessary work. The agreement set in place cost sharing responsibilities, a process to review details of the campaign, costs associated, and how and when reimbursements to NYSERDA will be made.

### **Hard Copy Customer Education Collateral and Multilingual Communications**

While the online NY Energy Advisor is a critical resource for providing information to LMI customers, approximately 7% of adults nationwide, of which 25% are aged 65 and

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<sup>98</sup> See, Technical Resource Manual Management Plan filed August 15, 2018 in Cases 14-M-0101, 15-M-0252 and Matter 15-01319. Cost share percentages were informed by EM&V work previously completed under the directives and guidance provided in Case 07-M-0548, *Proceeding on Motion of the Commission Regarding an Energy Efficiency Portfolio Standard* (“EEPS”). The cost share percentages outlined in this document are derived from contract negotiations amongst the TRM MC member companies, which occurred as part of bringing the TRM Administrative Vendor on board.



older,<sup>99</sup> do not have access to a computer or mobile device in their home. To address this fact, the Program Administrators will complement the NY Energy Advisor website with written materials that provide similar branded messaging about Portfolio offerings. These materials will be distributed for use by contractors and community-based partners to hand out to their clients. The focus of these materials will be to provide initiative information and encouragement for customers to take action by calling their utility, NYSEERDA's customer service center, or a community-based partner organization to receive assistance in applying for participation. Currently, collateral is available in several languages (to date, English, Chinese, Russian, and Spanish).

### **Community-Based Marketing and Paid Advertising**

To complement the NY Energy Advisor and the community-based outreach and education elements described above, the Program Administrators may conduct multi-lingual marketing through local media, with an emphasis on marketing delivered through local news outlets and community officials and opinion leaders. The Program Administrators may look to leverage their community-based partners' relationships with local media and ability to garner earned media to promote programs.

Additional local marketing may include paid advertising to raise awareness about the LMI programs. Examples of paid advertising that may be considered are:

- Public transportation posters and billboards
- Google searches
- Social media
- Local electronic and print media
- Direct mail/email campaigns tailored to LMI customers who have been identified as categorically eligible based on geographic eligibility guidelines, or who are identified in utility customer databases as being eligible for HEAP or low-income rate discounts

### **Objectives:**

- Provide consistent messaging statewide
- Develop clear, concise messaging as to what is being offered, where to find the offerings, who is offering them, who qualifies for the offerings, and the value of participation
- Provide streamlined, easy access to LMI initiatives and services for LMI customers, affordable multifamily property owners and managers, contractors, and stakeholders throughout the state

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<sup>99</sup> Pew Research Center – April 2, 2021 "7% of Americans don't use the internet and who they are"

- Complement the NY Energy Advisor website with written materials that provide similar branded messaging about Portfolio offerings
- Identify and develop solutions to overcome barriers of engaging LMI customers and other stakeholders
- Raise LMI customer awareness about Portfolio initiatives and services
- Establish inclusive outreach campaign that reflects the diversity of LMI New Yorkers

**Overview**

<p>Status Prior to New Statewide LMI Portfolio Offering</p>	<p><b>Statewide Branding</b>          NYSERDA managed statewide branding efforts for a range of programs, including primarily EmPower, AHP, MPP, and FlexTech. The Utilities did not have statewide branding prior to the new Statewide LMI Portfolio Offering, given that any Utility-specific programs and initiatives did not extend beyond their own service territory. A statewide branding approach therefore represented a significant opportunity in the transition to the Statewide LMI Portfolio.</p> <p><b>NY Energy Advisor</b>          Prior to launch of the NY Energy Advisor, there was no equivalent one-stop customer website for LMI programs statewide. NYSERDA and each of the Utilities had websites with appropriate information and links for the particular programs they offered.</p> <p><b>Hard Copy Customer Education Collateral and Multilingual Communications</b>          The Program Administrators separately developed and distributed hard copy customer education collateral. The Program Administrators generally provided such material in several languages.</p> <p><b>Community-Based Marketing and Paid Advertising</b>          Each of the Program Administrators engaged in separate local community-based marketing and paid advertising.</p>
<p>Transitional Phase</p>	<p><b>Statewide Branding</b>          In the 2020 Implementation Plan, the Program Administrators identified the development of a statewide brand for the LMI Portfolio as an objective. In the continuing development since the filing of the 2020 Plan, the Program Administrators have shifted focus from developing a single brand for the whole Statewide LMI Portfolio to the topic of statewide branding by program. The following programs currently use statewide branding: EmPower, AHP, AMEEP, and FlexTech. NY Energy Advisor and its marketing campaign represents an additional statewide branding effort and name.</p> <p><b>NY Energy Advisor</b>          The full New York Energy Advisor website was developed and launched in 2021, replacing the interim website. This is a platform that offers streamlined access to initiatives and services for LMI customers, affordable multifamily property owners and managers, contractors, and stakeholders throughout the state. The NY Energy Advisor is designed to provide clear, consistent, and easy-to-find information on all relevant LMI initiatives and</p>

	<p>services, including energy efficiency, renewable energy, and energy education materials. This website is expected to reduce customer, contractor, and stakeholder confusion and the need to search for assistance on multiple websites.</p> <p><b>Hard Copy Customer Education Collateral and Multilingual Communications</b> In addition, collateral materials will be developed and made available for community and utility advocates. Material is provided in several languages (to date, English, Chinese, Russian, and Spanish).</p> <p><b>Community-Based Marketing and Paid Advertising</b> Individual Program Administrators are continuing to develop and implement community-based marketing and paid advertising efforts.</p>
Full Implementation	<p><b>Statewide Branding</b> Some statewide branding that is currently in market is planned to continue in market in the Full Implementation Phase, <i>e.g.</i>, AMEEP, FlexTech, and NY Energy Advisor. One major statewide branding update will be the transition of the current EmPower and AHP brands into the new, combined EmPower+ brand, slated for launch in 2023.</p> <p>A key focus of statewide branding is to effectively complement individual Utility and more localized marketing efforts.</p> <p><b>NY Energy Advisor</b> The NY Energy Advisor website has been launched and is currently serving the market. The site provides:</p> <ul style="list-style-type: none"> <li>• Information on the Portfolio offerings</li> <li>• Links to program intake forms</li> <li>• Contact information on how to access community outreach representatives (see <a href="#">Section 5.3</a>, below)</li> <li>• Links to other programs and resources, as appropriate for the audience</li> <li>• Access to information in multiple languages</li> </ul> <p>A tool kit containing resources for stakeholders is located on the LMI Resource Page.<sup>100</sup> The toolkit includes downloadable fact sheets, posters, and social media information all to be used by stakeholders to promote the NY Energy Advisor and in turn, programs and services for LMI customers and affordable property owners. A tutorial video</p>

<sup>100</sup> <https://www.nysersda.ny.gov/All-Programs/Low-to-moderate-Income-Programs/LMI-Stakeholder-Resources-New-Efficiency-New-York>

	<p>demonstrating how to use the NY Energy Advisor website was launched and is available for use.<sup>101</sup></p> <p>In the future, the Program Administrators will aim to increase market awareness and use of NY Energy Advisor. The site will also be adjusted and updated based on evaluation of paid media, stakeholder, and customer feedback.</p> <p><b>Hard Copy Customer Education Collateral and Multilingual Communications</b> Program Administrators will work to provide consistent hard copy customer education collateral, and multilingual communications to reach identified customer demographic groups.</p> <p><b>Community-Based Marketing and Paid Advertising</b> Program Administrators will continue to develop and deploy community-based marketing and paid advertising as effective complements to other marketing and engagement efforts.</p>
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***Target Market and Delivery Method***

Market Segment Addressed	LMI customers, affordable multifamily property owners and managers, contractors, and stakeholders throughout the state
Delivery Method	NY Energy Advisor website, hard copy collateral, paid advertising, community engagement

***Stakeholder / Market Engagement***

Key Partners	Community-based organizations
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<sup>101</sup> Stakeholders, regulators, and others may review the tutorial to understand how the NY Energy Advisor works or to help answer questions a customer might have, including in response to call center inquiries.

### Key Milestones (2022-2024)

Year	Milestone	Status
2022	<p><b>NY Energy Advisor:</b></p> <ul style="list-style-type: none"> <li>Launch a marketing campaign for the NY Energy Advisor in Q1 2022 that will continue through 2025</li> </ul> <p><b>Hard Copy Customer Education Collateral and Multilingual Communications:</b></p> <ul style="list-style-type: none"> <li>Develop and distribute to stakeholders hard copy customer collateral beginning in Q1 2022 in parallel with operation of the online NY Energy Advisor, to ensure consistent messaging and calls to action and to streamline development costs. Materials available in multiple languages include posters and fact sheets.</li> </ul> <p><b>Community-Based Marketing and Paid Advertising:</b></p> <ul style="list-style-type: none"> <li>Specific media and paid advertising approaches will be developed and coordinated with the statewide campaign and as initiatives are added/changed in the Portfolio.</li> </ul>	In Progress
2023	<p><b>NY Energy Advisor:</b></p> <ul style="list-style-type: none"> <li>Review NY Energy Advisor analytics determining effectiveness of marketing campaigns</li> <li>Make adjustment to paid media campaigns if needed</li> <li>Continue to support the Program Administrators and stakeholders' efforts to obtain earned media</li> </ul>	Future
2024	<p><b>NY Energy Advisor:</b></p> <ul style="list-style-type: none"> <li>Continue to analyze NY Energy Advisor marketing campaigns. Make adjustments to the campaign.</li> </ul>	Future

### 5.2 Community-Based Outreach, Education, and Engagement Partnerships

Access to clean energy programs and resources and the broader set of benefits they bring can be more difficult for LMI households and disadvantaged communities, due to the various economic and institutional barriers present in the LMI customer segment. To increase adoption of energy efficiency and realize the benefits of clean energy, it is therefore important for Program Administrators to work with CBOs, who are trusted resources in the community, to connect residents with program opportunities, increase awareness and education of clean energy issues, educate residents on ways to reduce energy consumption and bills, leverage workforce development opportunities, and identify services necessary to undertake energy efficiency projects.

### Expansion of Existing LMI Community Partnerships

NYSERDA will establish Regional Clean Energy Hubs (“Hubs”), one in each of the ten economic development regions across the state, with the exception of the New York City region where up to three hubs will be established, to assist communities and residents with accessing clean energy programs and solutions. Investment in the establishment of Hubs is intended to build capacity at the local level and position disadvantaged communities to participate in and benefit from the clean energy economy.

#### **Objectives:**

- Increase awareness of and access to clean energy solutions and opportunities
- Increase consumer uptake of clean energy projects, with support for accessing wraparound (non-energy) services and resources
- Advance local capacity to engage with community members about clean energy policy, technologies, and opportunities
- Increase public participation in energy planning and program coordination activities
- Increase partnerships with clean energy partners, affordable housing providers, non-energy partners, third-party funding providers, philanthropic organizations, etc. that result in scalable activities and projects
- Increase the diversity of participating contractors in the clean energy sector
- Support career pathways for individuals currently residing in disadvantaged communities or from priority populations, through partnerships with training, education, and clean energy businesses for employment opportunities in the clean energy workforce

#### **Overview**

Status Prior to new Statewide LMI Portfolio Offering	<p>NYSERDA administers the Community Energy Engagement Program (CEEP), launched in 2017 across New York State, which provides resources for Community Energy Advisors to:</p> <ul style="list-style-type: none"><li>• Enable participants to make informed energy decisions</li><li>• Inform participants of financing options for energy efficiency and renewable energy projects and products</li><li>• Guide participants through the process of implementing a clean energy project</li><li>• Connect participants with the right energy contractors who can implement clean energy projects</li></ul> <p>Through the CEEP, NYSERDA awarded approximately \$5.5 million to deploy Community Energy Advisors (“CEA”) to conduct outreach and engagement activities to residents, small businesses, and multifamily building owners, with an emphasis on LMI households and communities.</p>
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	<p>CEEP expanded the reach of NYSERDA programs throughout the entire State to incorporate a regional approach, thus providing geographic alignment with other State efforts and full statewide coverage. Ten (10) locally based and constituency-based organizations were deployed statewide.</p>
Transitional Phase	<p>NYSERDA conducted a co-design process with 30 community partners in 2020 to get input and improve outreach and engagement within disadvantaged communities.</p> <p>To support a teaming arrangement and to facilitate partnerships in the delivery of the Hub services, a web-based Clearinghouse was made available in 2021 on NYSERDA’s website for organizations to express their interest.</p> <p>Current CEEP contracts extended to June 30, 2022 to provide continuity and avoid interruptions in outreach and engagement services until the Regional Clean Energy Hubs initiative launches. The Regional Clean Energy Hubs RFP 4630, which builds on previous community-based outreach and engagement efforts, commences in Q3 2022.</p>
Full Implementation	<p>The Regional Clean Energy Hubs will:</p> <ul style="list-style-type: none"> <li>• Act as a trusted local resource for community members to learn more about the energy-related programs and services available to them</li> <li>• Increase awareness of these programs and services by leveraging the expertise and trust of local community organizations - particularly those with a proven track record of engaging disadvantaged communities</li> <li>• Develop outreach and engagement strategies to elevate the needs of communities and residents into program and policy development</li> <li>• Address gaps in and advancing diversity of the clean energy workforce by connecting residents with educational, training, and job opportunities and small businesses with resources to support economic development</li> </ul>

***Target Market and Delivery Method***

Market Segment Addressed	Homeowners, renters, contractors/builders, affordable property owners, small commercial entities and nonprofits with an emphasis on disadvantaged communities
Delivery Method	<ul style="list-style-type: none"> <li>• Hubs will deploy Energy Advisors within each region to connect community members to clean energy and related programs and resources</li> <li>• Hubs will implement community campaigns and local projects and pilots</li> </ul>

**Stakeholder / Market Engagement**

Key Partners	<p>Key community-based partners will play an important role with the Regional Clean Energy Hubs and generally include:</p> <ul style="list-style-type: none"> <li>• CBOs</li> <li>• Local, state, and federal agencies</li> <li>• Regional Economic Development Councils (“REDCs”)</li> <li>• Ecumenical organizations and communities</li> <li>• Philanthropic organizations</li> <li>• Low-income and affordable housing advocacy groups</li> <li>• Community coalitions and associations</li> <li>• Homeowner and tenant associations</li> <li>• Educational institutions</li> <li>• Corporations and trusts</li> <li>• Banks and financial institutions, particularly community development financial institutions (“CDFIs”)</li> <li>• Environmental, health, and energy efficiency advocacy groups (national, statewide, and local)</li> <li>• Skilled trade groups, unions, and engineering societies</li> <li>• Retailers and installation contractors</li> <li>• Community event organizers (fairs, home shows, etc.)</li> <li>• Small businesses and Business Improvement Districts (“BIDs”)</li> <li>• Utilities</li> </ul>
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**Implementation Milestones (2022-2024)**

Year	Milestone	Status
2022	<ul style="list-style-type: none"> <li>• Regional Clean Energy Hub network will be launched in Q3 2022 incorporating input from the co-design process with community partners in 2020 to improve the reach and impact of outreach and engagement within disadvantaged communities</li> </ul>	In Progress
2023	<ul style="list-style-type: none"> <li>• Hubs fully onboarded in the market and working with local communities to support and streamline program engagement</li> </ul>	Future
2024	<ul style="list-style-type: none"> <li>• Hubs to begin launching community campaigns and local pilot programs</li> </ul>	Future

**Budgets, Benefits and Performance Metrics**

The annual budgets, benefits and performance metrics for this initiative are included in Appendices C and D.



### 5.3 Community-Based Customer Engagement Initiatives

Utilities will continue to seek partnerships with organizations who directly or indirectly serve or advocate on behalf of the LMI community. Utilities will continue to engage eligible LMI customers through customized educational efforts and the distribution of free or discounted direct install measures directly or through trusted local organizations. These engagement initiatives provide customers with easy access to energy efficiency information, promote proven technology (*e.g.*, installation of LED lighting measures), and increase awareness of other efficiency programs offered in the Portfolio, including direct install measures, behavioral action recommendations, and general efficiency education.

Utility sponsors of such programs partner with organizations that provide LMI customers with the opportunity to opt in to receive free or heavily discounted efficiency measures and/or customized behavioral recommendations to reduce their energy consumption.<sup>102</sup> Types of initiatives include:

- Working with local food banks to distribute LEDs to low-income customers
- Distributing energy efficiency kits to customers participating in Utility low-income bill discount programs
- Working with measure vendors, local community-based organizations, and public agencies to provide free or heavily discounted energy efficiency measures to LMI customers
- Distributing HERs to LMI customers with customized energy efficiency recommendations

As part of the LMI JMC, the Program Administrators share experiences and lessons learned from offering these initiatives with each other. Currently, utilities are in different stages of design and implementation of these programs. Some utilities are currently running these programs and will continue to do so. Utilities that are in the process of developing such programs will continue the development process and launch new programs. Other utilities will begin strategy and design work to develop an offering. Throughout 2022, the Program Administrators will work together to share insights into these different programs and explore further coordination on similar initiatives.

#### **Neighborhood-Based Delivery Model**

Several of the Program Administrators have tested a neighborhood-based delivery model to improve energy affordability and increase access to clean energy solutions, energy education, and energy management tools for LMI customers. This was accomplished by providing no-cost services to all residential members of a defined geographic region and

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<sup>102</sup> Sponsoring utilities will avoid distribution of unsolicited measures, which can lead to low installation rates and customer complaints.

providing outreach and engagement through a fair-like event designed to bring together neighbors in a community to learn how to take action to become energy efficient and enroll in available programs. The pilot aimed to determine if this model reduces administrative costs associated with program implementation and income verification. This pilot is being evaluated to determine if this is an effective model for delivering LMI and energy efficiency services to customers.

Upon a positive evaluation, the Program Administrators will aim to expand the reach of this pilot throughout the State and use the neighborhood-based delivery model as a mechanism to reach LMI customers in their communities, reduce administrative costs, create a holistic one-stop shop for customers and increase LMI customer access to LMI and energy efficiency programs.

The expected outcome is that this model will allow programs to reach, engage, enroll, and serve more LMI customers more cost-effectively, increase trust in the programs and in Program Administrators by reaching customers through trusted community leaders, and connect customers with other LMI social services.

**Objectives:**

- Increase LMI customer awareness of the financial, comfort, health & safety and environmental benefits of energy efficiency and clean energy
- Promote participation in deeper LMI efficiency programs
- Capture direct savings from the installation of no- or low-cost energy efficiency measures (*e.g.*, LED bulbs, showerheads, faucet aerators, advanced power strips) to LMI customers through trusted community partners
- Provide behavioral recommendations to improve LMI customer home comfort and efficiency
- Build customer trust in and appreciation of participating organizations and sponsoring utilities, leading to greater willingness to participate in other LMI programs
- Build relationships with participating community-based partners, leading to their participation in promoting other Statewide LMI Portfolio programs

**Overview**

<p>Status Prior to new Statewide LMI Portfolio Offering</p>	<p><b>Community-Based Customer Engagement Initiatives</b>                  Prior to the new Statewide LMI Portfolio offerings, several utilities had community-based customer engagement initiatives.</p> <p>In 2020, Con Edison distributed energy efficiency kits to customers participating in Con Edison’s Low Income Discount Program, which</p>
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provides bill assistance. Kits contained LED lightbulbs, two faucet aerators, and a low-flow showerhead. Con Edison also collaborated with food pantries and Techniart to distribute LEDs to low-income customers. Further, Con Edison distributed home energy reports (“HERs”) to LMI customers, providing education on energy usage in the home and tips for reducing consumption. Con Edison also created an advertisement on Fresh EBT, a free app that recipients of the Supplemental Nutrition Assistance Program (“SNAP”) can use to help manage their benefits, to increase energy efficiency awareness.

Since 2016, Central Hudson’s Community Lighting program has partnered with support agencies throughout its service territory including local United Way chapters, food banks, food pantries and departments of social services to provide ENERGY STAR certified LED bulbs to Central Hudson qualified, limited-income families at no cost. Over 30 organizations distributed 35,000 LED bulbs to low-to-moderate income community members through 2020.

In 2020, Orange & Rockland partnered with food banks to distribute 7,704 LED light bulb kits. The kits included messaging to educate customers about energy efficiency and included a link to Orange & Rockland’s EmPower webpage to drive awareness of the program. While this program benefited LMI customers, the savings and budgets related to this effort were reported under Orange & Rockland’s electric portfolio.

**Neighborhood-Based Delivery Model**

In 2019, National Grid and NYSERDA partnered to implement a project to test a neighborhood-based delivery model for energy efficiency services. The Watertown Energy Fair was hosted by National Grid and NYSERDA in 2019 in Watertown, NY as a one-day event held in the community that aimed to provide a holistic experience for customers to access clean energy and energy affordability solutions.

In 2019, Orange & Rockland and NYSERDA partnered to test a neighborhood-based delivery model for energy efficiency services. Orange & Rockland and NYSERDA hosted two events at the YMCA Center for Youth Programs in Middletown, NY. The first event, the Halloween Middletown Festival, was held in October 2019 and was used to pre-register eligible customers for EmPower and invite them to the second event, the Middletown Energy Fair. The Middletown Energy Fair provided an additional opportunity to reach a targeted number of income-eligible customers while also providing various energy savings opportunities and educational materials to the community at large. These events were strategically offered in areas that had a significant number of income-eligible customers, and enabled direct engagement opportunities with customers.

<p>Transitional Phase</p>	<p><b>Community-Based Customer Engagement Initiatives</b></p> <p>In 2021, Con Edison distributed kits to customers participating in Con Edison’s Energy Affordability Program (formerly the Low Income Discount Program). This program was transitioned to opt-in for customers, and was re-launched in September 2021, with an online portal where eligible customers were able to claim a kit. Con Edison also collaborated with food pantries to distribute LEDs to low-income customers.</p> <p>In 2021, Central Hudson transitioned the Community Lighting program from their market rate portfolio under the Statewide Low-to Moderate-Income Portfolio. Due to the ongoing pandemic, we were unable to distribute LEDs throughout 2021. Since Central Hudson was unable to distribute LEDs in 2021, efforts were directed towards adding additional partners to the distribution network and designing packaging materials to include with the LEDs. A printed sleeve was added to the packaging, highlighting the ENERGY STAR LED contents and providing guidance on payment assistance programs such as EmPower NY, HEAP and other Low-Income Bill Discount programs offered.</p> <p>In 2021, NFGDC provided 10,000 weatherization kits to area block clubs, community-based organizations, and area non-profits. Although this program benefited LMI customers, the funding related to this effort came from non-LMI sources, so associated savings and participant numbers are not included in this Plan. The pandemic created a need to promote greater awareness of newly implemented payment assistance programs, the HEAP Residential Supplement Plan and the NYS Emergency Rental Assistance Program. NFGDC created a slip sheet that was placed into a door hanger for customer homes to alert customers of the various assistance programs that are available and urging a phone call if anyone was struggling to pay their bill.</p> <p>In 2021, National Grid launched its Food Bank LED program to increase awareness of programs and services available to its customers and to encourage customers to utilize them. National Grid developed a partnership with the local Buffalo area food bank as well as NYSEG to distribute LED lightbulbs and brochures that contained information on energy efficiency and payment assistance programs such as EmPower NY, HEAP, National Grid’s Energy Affordability Program (“EAP”) and assistance provided by National Grid’s Consumer Advocates. National Grid and NYSEG partnered in this location due to their overlapping service territory to utilize resources most efficiently, create cost efficiencies and ensure there was no redundancy.</p> <p>In 2021, Orange &amp; Rockland partnered with food banks to distribute 13,392 LED light bulb kits. The kits included messaging to educate customers about energy efficiency and included a link to Orange &amp;</p>
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	<p>Rockland’s EmPower Webpage to drive awareness of the program. While this program benefited LMI customers, the savings and budgets related to this effort were reported under Orange &amp; Rockland’s electric portfolio.</p> <p><b>Neighborhood-Based Delivery Model</b>          NYSERDA completed an evaluation on the pilot in 2021 to determine the effectiveness of a neighborhood-based delivery model in reaching LMI customers, increasing participation and adoption rates. An analysis of this evaluation will occur in 2022 and findings and lessons learned will be used to inform future neighborhood-based delivery models and events to serve as a means of reaching LMI customers and easily getting them connected to energy efficiency and other social services. The planning of another in-person energy fair was de-prioritized in 2020 and 2021 due to the pandemic, but will be revisited in 2022 with the analysis of the evaluation results.</p>
<p>Full Implementation</p>	<p><b>Community-Based Customer Engagement Initiatives</b>          Utilities plan to provide continued implementation of their initiatives going forward, allowing for regular and consistent engagement with the market. Further coordination and sharing of lessons learned by Program Administrators offering the same or similar initiatives will take place as all offerings reach their full implementation phase. Program Administrators will plan provide offerings as follows:</p> <ul style="list-style-type: none"> <li>• Con Edison will continue to offer the opt-in kits offering and work with food pantries to distribute energy efficiency measures to customers.</li> <li>• Central Hudson will continue to offer the Community Lighting program and distribute LED bulbs at no cost through partnerships with local not-for-profit organizations that serve low-income customers. This initiative will continue to target customers utilizing services from organizations such as the United Way and Food Panties. Additional information will continue to be provided with the LEDs to educate customers about energy savings, payment assistance programs, and the NY Energy Advisor.</li> <li>• National Grid will continue to work with foodbanks in its upstate NY territory to distribute LED lightbulbs and brochures containing information about energy efficiency and payment assistance programs and services. National Grid seeks to continue close coordination with utilities overlapping with its service territory.</li> <li>• NFGDC will continue to provide weatherization kits to area block clubs, community-based organizations, and area non-profits.</li> <li>• Orange and Rockland will expand their food bank kit offering and provide energy efficiency kits via an opt-in approach to customers participating in the Company’s Energy Affordability Program. Additionally, O&amp;R will expand the existing MY ORU</li> </ul>

	<p>Store ecommerce platform to include additional functionality that offer new tools, products, and additional rebates that will engage and guide LMI customers to make energy wise decisions for their home.</p> <p><b>Neighborhood-Based Delivery Model</b> Depending on the analysis of current pilot efforts, may make develop and offer initiatives using the neighborhood-based delivery model.</p>
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***Target Market and Delivery Method***

Market Segment Addressed	LMI customers
Delivery Method	Information and measures distributed through community-focused methods and community organizations that are trusted and frequented by LMI customers. Measures may also be distributed directly from the utilities through program vendors.

***Eligible Measures and Incentive Structure***

Eligible Measures	Programs may include LED lightbulbs, energy efficiency kits (which may contain measures such as LED lightbulbs, low-flow showerheads, and faucet aerators), and other low-cost measures
Incentive Structure	Varies, but generally no cost to customers

***Stakeholder / Market Engagement***

Key Partners	<p>Key partners include:</p> <ul style="list-style-type: none"> <li>• Food banks</li> <li>• School districts</li> <li>• Non-profits</li> <li>• Local community organizations</li> <li>• Local public agencies</li> </ul>
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**Key Milestones (2022)**

Year	Milestone	Status
2022	<p><b>Community-Based Customer Engagement Initiatives:</b></p> <ul style="list-style-type: none"> <li>• Central Hudson plans to continue their Community Lighting program and will distribute LEDs through Food Banks and the United Way starting again in 2022.</li> <li>• Con Edison will continue to offer energy efficiency kits via an opt-in approach to customers participating in Con Edison’s Energy Affordability Program (formerly called the Low Income Discount Program) and to collaborate with food pantries to distribute LED lightbulbs.</li> <li>• National Grid will expand their LED Food Bank program to the Albany and Syracuse area and increase frequency to twice per year with continued collaboration with NYSEG/RGE.</li> <li>• Orange &amp; Rockland will expand their food bank kit offering and provide energy efficiency kits via an opt-in approach to customers participating in the Company’s Energy Affordability Program. Additionally, O&amp;R will expand the existing MY ORU Store to present specific LMI customers with additional rebates for energy efficient products.</li> </ul> <p><b>Neighborhood-Based Delivery Model:</b></p> <ul style="list-style-type: none"> <li>• During the balance of 2022, the Program Administrators will assess evaluation results from the existing pilots and determine effectiveness of the neighborhood-based delivery model. If warranted, the Program Administrators will develop a replicable event/implementation plan, including consideration of remote webinar-based platforms as an alternative delivery mechanism to minimize risks associated with large, in-person events. This event/outreach strategy would be incorporated beginning in 2022 after final evaluation results are determined.</li> </ul>	In Progress

## 6. Coordination with External Program Administrators and Other Organizations

In addition to coordination across the Program Administrators, there are additional opportunities to work with programs administered by New York State agencies, local government, and CBOs to reduce redundancy and to increase coordination, effectiveness, and impact for the customer.

**Table 7: Summary of Statewide Coordination Efforts**

Organizations	Nature of Coordination
New York State Department of Environmental Conservation	<ul style="list-style-type: none"> <li>• Explore opportunities to improve energy and health outcomes in environmental justice and disadvantaged communities</li> <li>• Support operationalization of Climate Act investment requirements</li> </ul>
DOH	<ul style="list-style-type: none"> <li>• Develop an approach to quantify the health outcomes and healthcare cost reductions associated with energy efficiency improvements</li> <li>• Explore opportunities for developing a programmatic approach for addressing energy efficiency and healthy homes improvements for low-income customers</li> </ul>
NYS HCR	<ul style="list-style-type: none"> <li>• Support the development of technical capacity and access to performance data (<i>e.g.</i>, benchmarking)</li> <li>• Explore systematic improvements to policies and processes so that the benefits of clean energy are embedded upstream of tenants and building owners, such as:               <ul style="list-style-type: none"> <li>○ Exploring opportunities to increase energy performance requirements associated with the Low-Income Housing Tax Credit and the Qualified Allocation Plan;</li> <li>○ Advancing adoption of an IPNA, in coordination with other key stakeholders including housing authorities;</li> <li>○ Exploring the development of underwriting criteria for high performance new construction and preservation projects, based on reduced operational costs; and</li> <li>○ Piloting model-based utility allowances in New York, in coordination with other key stakeholders.</li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>• Alignment between WAP and EmPower NY to reduce overlap and administrative burden for the agencies, service providers, and customers</li> <li>• Support mobilization of New York’s \$289 million WAP funding allocation under the Bipartisan Infrastructure Law of 2021</li> </ul>
NYS Office of Temporary and Disability Assistance	<ul style="list-style-type: none"> <li>• Maximize the reach of HEAP funds through increased consumer education and targeted efficiency services</li> </ul>
Low-Income Energy Program Interagency Task Force <sup>103</sup>	<ul style="list-style-type: none"> <li>• Development of a cohesive approach to serve low-income energy customers across the programs administered by New York State agencies to reduce redundancy and increase coordination, effectiveness and impact for the customer.</li> </ul>
PSEG Long Island	<ul style="list-style-type: none"> <li>• Coordination between KEDLI’s HEAT Program and PSEG Long Island’s REAP program, where the Program Administrators exchange leads so customers can participate in both gas and electric energy efficiency programs</li> <li>• Explore opportunities to more closely coordinate the AMEEP program with multifamily programs offered by PSEG Long Island</li> </ul>
Long Island Power Authority	<ul style="list-style-type: none"> <li>• Coordination with LIPA through programming such as EmPower and HEAT to leverage statewide models</li> </ul>

The Joint LMI Management Committee will continue to examine and address the coordination of work with external program administrators to see that the Statewide LMI Portfolio effectively delivers clean energy solutions to LMI customers and communities.

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<sup>103</sup> The Low-Income Energy Program Task Force was formed by the Office of the Governor in May 2016 to bring together the New York State agencies responsible for administering low-income energy programs for developing a cohesive strategy for serving LMI energy customers, increasing coordination and sharing information.

## 7. Benefit Cost Analysis

This section presents the results of the Benefit Cost Analysis (BCA) for the Statewide LMI Portfolio of initiatives.<sup>104</sup>

The Program Administrators calculated the BCA following the NYS BCA Framework<sup>105</sup> and subsequent DPS guidance.<sup>106</sup> A common approach was used to calculate the Portfolio BCA found in [Table 8](#) and Program Administrator-specific assumptions were used according to utility BCA handbooks.

The BCA results reflected in Table 8 will be refined as the initiatives are further developed. The BCA results for the Societal Cost Test (“SCT”) include the benefits associated with reduced carbon emissions, calculated in line with the most recently updated values promulgated by the New York DPS in December 2021.<sup>107</sup> The carbon emission benefits included in the 2022 BCA were updated using the most recent inputs for calculation of carbon impacts based on communication with, and at the direction of, DPS Staff. Additionally, revisions to program design as well as the inclusion of new programs and measures also generated changes between the 2020 and 2022 BCAs. Portfolio BCA results are largely comparable for the Utility Cost Test (“UCT”), though there are changes for individual Program Administrators, and SCT results in 2022 are approximately 67% higher than those reported in 2020, which is largely driven by the updated carbon emission benefits inputs.

Portfolio-level BCA results are shown in Table 8.

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<sup>104</sup> While the Program Administrators provided an updated BCA in 2022 (*i.e.*, NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio Implementation Plan, Version 2 (filed April 29, 2022)), a new BCA was not conducted for the Nov. 1, 2022 filing or May 1, 2023. A new BCA will be conducted in conjunction with the next annual Implementation Plan to be filed, scheduled for filing in the fall of 2023.

<sup>105</sup> Case 14-M-0101, *Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision*, Order Establishing the Benefit Cost Analysis Framework, (issued January 21, 2016).

<sup>106</sup> Clean Energy Guidance CE-07: *Utility-Administered Energy Efficiency Utility Filing Requirement Guidance* (issued May 14, 2018).

<sup>107</sup> [https://www.dec.ny.gov/docs/administration\\_pdf/vocapp22.pdf](https://www.dec.ny.gov/docs/administration_pdf/vocapp22.pdf)

**Table 8. Statewide LMI Portfolio BCA Results**

	Societal Cost Test (SCT)			Utility Cost Test (UCT)		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$215,029,797	\$258,279,575	0.83	\$111,311,285	\$152,296,309	0.73
2023	\$295,895,465	\$261,521,182	1.13	\$160,304,929	\$152,967,685	1.05
2024	\$334,613,039	\$285,663,034	1.17	\$183,749,880	\$166,157,984	1.11
2025	\$386,988,833	\$299,315,515	1.29	\$215,211,746	\$146,146,108	1.47
2026	\$155,304,952	\$137,101,783	1.13	\$89,752,333	\$48,146,083	1.86
2027	\$45,406,627	\$98,047,352	0.46	\$25,954,905	\$17,777,508	1.46
2028	\$13,661,876	\$9,450,895	1.45	\$7,927,563	\$6,613,693	1.20
2029	\$4,930,952	\$2,515,370	1.96	\$2,882,858	\$2,515,370	1.15

## 8. Evaluation, Measurement, & Verification Approach

As described below, the Program Administrators take a coordinated approach to estimating savings and evaluating LMI initiatives. This includes standardized statewide savings estimation approaches, collaborative evaluation activities, and continuous monitoring of and feedback on Performance Metrics. Specific program-level savings estimation approaches and evaluation schedules are detailed in the VGS Specifications, which are coordinated across the Program Administrators and are jointly filed.<sup>108</sup>

### 8.1 Savings Estimation

In general, the Program Administrators will continue to rely on the TRM and best practices to estimate savings and achieve VGS goals. Given that LMI customers often have older and less efficient equipment than their market-rate peers, and given the need to fully account for LMI customer savings, an existing baseline approach will be employed where possible. To minimize administrative challenges that could result from using different baseline assumptions for different customer segments, particularly within a program that concurrently serves both LMI and non-LMI customers, the following overarching savings estimation approaches will continue to be used:

#### Prescriptive

For prescriptive measures, details of existing conditions in LMI customer residences may be substituted for parameters in the TRM to calculate savings.<sup>109</sup> The TRM currently

<sup>108</sup> The initial VGS Specifications were filed in December 2020. NE: NY Proceeding, Consolidated LMI VGS Specifications (Filed December 14, 2020). Updated VGS Specifications are being filed concurrently with this Implementation Plan.

<sup>109</sup> <https://www.nyscrda.ny.gov/All-Programs/Low-to-moderate-Income-Programs/LMI-Stakeholder-Resources-New-Efficiency-New-York/NYS-Affordable-Multifamily-Energy-Efficiency-Program>.

contains language describing this methodology.<sup>110</sup> Further, program manuals such as the AMEEP Program Manual contain guidance for providing information about existing conditions to be used in savings calculations. Additionally, baseline studies or other evaluation materials will be leveraged, where available, to calculate an average existing condition baseline that approximates the type and age of equipment currently installed by LMI customers. This will allow for a uniform deemed savings approach for common prescriptive measures within the Statewide LMI Portfolio, either at a statewide or more granular level depending on availability of data and measure-specific characteristics.<sup>111</sup> Using evaluation and other research data to determine these average baseline values will promote coordination of evaluation methodologies amongst Program Administrators (discussed in further detail below), and will allow for increased savings accuracy while minimizing the burden of customer data collection. This average baseline approach will also preserve implementation efficiencies by streamlining application processing and savings calculations.

If, for a particular measure, baseline studies or other supporting evaluation material is not available for determining an average existing condition baseline, standard TRM assumptions are to be used until new information becomes available through evaluation activities or through other pertinent research facilitated by the TRM Management Committee (“MC”). Evaluation activities that will contribute to improving LMI-specific baseline assumptions will be detailed as part of established ETIP/SEEP and VGS Specification processes.<sup>112</sup> As baseline assumptions become available, they will be documented in VGS Specifications, incorporated into programs, and, through coordination with the TRM MC, documented in the TRM.

### **Custom**

For custom measures, project-specific existing condition baselines are used. Analyses of current custom calculation tools, such as EmPCalc,<sup>113</sup> are ongoing, and updates will be made to align savings methodologies in these tools with the TRM and an existing condition approach, as necessary.

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<sup>110</sup> Technical Resource Manual, Version 9 - Filed October 27, 2021 (effective January 1, 2022), p. 5, “Application of Methods for Low- and Moderate-Income (LMI) Residential.” [https://www3.dps.ny.gov/W/PSCWeb.nsf/96f0fec0b45a3c6485257688006a701a/72c23defff52920a85257f1100671bdd/\\$FILE/NYS\\_TRM\\_V9.pdf](https://www3.dps.ny.gov/W/PSCWeb.nsf/96f0fec0b45a3c6485257688006a701a/72c23defff52920a85257f1100671bdd/$FILE/NYS_TRM_V9.pdf)

<sup>111</sup> For example, a granular approach may be warranted for certain HVAC measures to distinguish the prevalence of steam heating in downstate multifamily buildings. Where granular data is not available, a statewide average should be used.

<sup>112</sup> For each program a Program Administrator administers, the Program Administrator will submit a VGS Spec. Where there are coordinated programmatic and/or evaluation activities, VGS Specifications will be coordinated as well.

<sup>113</sup> EmPCalc is a custom modeling tool used by NYSERDA.

## 8.2 Performance Metrics Planning

In [Section 2.5](#), above, the Plan addresses Performance Metrics for the Statewide LMI Portfolio, including [Table 1: Portfolio Objectives and Performance Metrics](#). As noted in Table 1, for certain of the metrics, EM&V is a key component, including the below:

Portfolio Customer Experience	
Increase customer Portfolio awareness	Percentage of LMI customers that learn about Portfolio initiatives from various sources ( <i>e.g.</i> , NY Energy Advisor website, Utility or NYSERDA outreach materials, contractors, etc.)
Achieve high customer satisfaction	Participation satisfaction rating
Advance energy affordability for LMI customers	Participant bill savings, annual and lifetime

As such, a key component of EM&V-related planning will be addressing these (and possibly other) performance metrics.

Program Administrator EM&V team activity to research and evaluate performance for these metrics may include the following:

- Surveys
- Coordination with EM&V contractors to study and determine outputs for the factors
- For the three Portfolio Customer Experience performance metrics, the third-party evaluator chosen for the statewide evaluation will determine the methods for calculating the metrics in coordination with the Program Administrators.

## 8.3 VGS Specifications

The Program Administrators have continued to undertake VGS activities since the 2020 Implementation Plan filing, including continued development and revisions of the VGS Specifications. The VGS Specifications for the Statewide LMI Portfolio are organized into four sections: Existing 1-4 Family Homes; Existing Affordable Multifamily Buildings, Affordable New Construction, and Additional LMI Initiatives. Key activity and issues for each of these categories is described in the Overview table below; additional information and detail is provided in the VGS Specifications.

## 8.4 General Approach to Evaluation of Initiatives

Evaluation activities for the Statewide LMI Portfolio are and will continue to be coordinated among the Program Administrators where possible and will be designed to provide insight into Performance Metrics tied to savings, participation, customer

experience, and Portfolio efficiencies. These activities will also continue to be incorporated into the PM&IP.

It is important to note that statewide evaluations may be difficult to implement for all programs given that each Program Administrator may have a unique Portfolio mix, and that Utilities have different rate case periods that inform evaluation cycles. Additionally, individual Program Administrators may have recently evaluated, or are currently evaluating, certain programs that include LMI customers. These factors will continue to inform each Program Administrator's evaluation priorities and schedule of activities.<sup>114</sup> Given this, the Program Administrators will continue work on non-program specific activities that will be able to provide meaningful insights across the State. As discussed earlier, this may include coordinated baseline studies, with longitudinal updates. This may also include research to assist in identification of LMI buildings and customers to better serve these customers and communities, research around non-energy benefits, such as household safety and comfort, and other process evaluation activities.

VGS-compliant impact evaluation activities for programs that span all or many Program Administrators will also continue to be prioritized in the short term. Where one Program Administrator is implementing a program on behalf of other Program Administrators, as in the case of EmPower NY, the implementing Program Administrator will take primary ownership of evaluation activities, including the development process for VGS Specifications, and results from the administrator's evaluation will continue to be used in the reporting of savings achieved. In the case of AMEEP, where Program Administrators are jointly operating the program using a statewide framework, the Program Administrators will collaborate to perform a statewide evaluation. This coordination will continue to be conducted as part of larger implementation arrangements at a program level and will be refined throughout 2022.

Collectively, these activities will continue to provide important insight needed in the short term to optimize Portfolio offerings and increase the number of households served annually, while allowing the Program Administrators to work through data sharing, evaluation funding, evaluation timing, and other complexities.

To facilitate future coordinated evaluation activities, the Program Administrators will continue to identify specific opportunities for collaboration, focusing on activities where Program Administrators share customers and/or Implementation Contractors, or otherwise overlap. The Program Administrators will also continue to collaborate on data

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<sup>114</sup> Further discussion of programmatic evaluation frequency can be found in Clean Energy Guidance CE:08, *Gross Savings Verification Guidance* ("CE-08"). This guidance provides options for scheduling evaluation (Gross Savings Analysis) work, and states that "a PA may use evaluation results conducted on a program's performance within the preceding five-year period, if the program has not significantly changed and the evaluation results calculated a realization rate consistent with this guidance." CE-08, p. 9.

collection tools and practices to streamline statewide evaluation and will embed LMI data collection into existing program evaluation when LMI customers are being served.

**Overview**

<p>Status Prior to new Statewide LMI Portfolio Offering</p>	<p>Prior to the new Statewide LMI Portfolio offerings, each Program Administrator that had an existing LMI program has planned, conducted, and used results from program-specific EM&amp;V studies, including realization rates. Reflecting ongoing operation of utility- and NYSERDA-administered programs and their associated evaluation efforts, program-specific realization rates will be used, where available, until an evaluation of the new statewide offerings can be completed.</p> <p><b>1-4 Family Homes:</b> Prior to the new Statewide LMI offering, the 1-4 family homes LMI customer market segment was served by several programs across the state, with each Program Administrator running VGS activity independently for their program. Energy savings for EmPower NY and AHP were estimated from program-supported modeling tools used by contractors when conducting home energy audits. For custom measures, project-specific existing condition baselines were used.</p> <p>Due to recent and ongoing evaluation efforts, each utility- and NYSERDA-administered program is using program-specific realization rates for the 2020-2021 program years where available, as described in the VGS specs, until the launch and evaluation of the statewide initiatives.</p> <p>In addition to Program Administrator-specific evaluation activities, the Program Administrators together have been:</p> <ul style="list-style-type: none"> <li>• Working to develop a standardized series of survey questions for statewide use when conducting process evaluation research with LMI customers in 1-4 family homes by Q3 2022</li> <li>• Collaborating to develop statewide and regional average existing condition baselines, where appropriate, as facilitated through the TRM Management Committee. In Q3 2021, key 1-4 family home LMI measures were identified for further research.</li> </ul> <p><b>Multifamily:</b> Each Program Administrator has planned, conducted, and used results from program-specific EM&amp;V studies, including realization rates. Reflecting recent and ongoing evaluation efforts, each utility- and NYSERDA-administered program will be using program-specific realization rates, where available, for the 2020-2021 program years and until an appropriate time after the launch of the statewide LMI Multifamily Portfolio offering (AMEEP).</p>
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	<p><b>New Construction:</b> Among the Program Administrators, only NYSERDA administered a new construction program across the State, <i>i.e.</i>, the Affordable New Construction program.</p> <p><b>Additional LMI Initiatives:</b> EM&amp;V for the programs addressed in this specification is conducted separately by the Program Administrator. NYSERDA administers Healthy Homes and the Solar for All programs. Central Hudson’s Community Lighting program provides LED bulbs to customers that utilize services from organizations such as United Way. Con Edison offers additional programming to its LMI customers through Food Bank Bulb Distribution (“Food Bank”) as part of its Retail Lighting program. Similarly, National Grid offers a Food Bank LED Light Bulb Giveaway in their Niagara Mohawk Service Territory. Con Edison offers an Efficiency Starter program, which provides free kits of low-cost energy savings measures to LMI customers within their respective service territories. Since 2020, Con Edison has been sending focused messaging to LMI customers via Home Energy Reports (HERs).</p>
Transitional Phase	<p>With the transition to the Statewide LMI Portfolio, in December 2020 the Program Administrators developed and filed the four VGS Specifications for the Statewide LMI Portfolio. Since then, the Program Administrators have continued to coordinate closely regarding the application of results from recent EM&amp;V activity to initiatives, to determine application to new statewide offerings. Program Administrators are continuing to coordinate on EM&amp;V activities in order to achieve program and cost efficiencies.</p> <p>As the new Statewide LMI Portfolio offerings were being developed and implemented, the Program Administrators continued to conduct evaluations on their own programs that were already operational in the market. Given recent and ongoing evaluation efforts, each utility- and NYSERDA-administered program will use program-specific realization rates, where available, during the years they were operational.</p> <p>In 2021, Program Administrators developed approaches for statewide evaluation of statewide programs, such as EmPower, EmPower+, and AMEEP, as described in the VGS Specifications. Until sufficient data becomes available to conduct these evaluations, Program Administrators have continued to work on activities that could provide statewide insights through evaluation. For example, the Program Administrators compiled survey questions for process evaluation research and have been standardizing the survey questions so they can be more comparable. The Program administrators will continue to refine those questions in 2022. Additionally, Program Administrators will work collaboratively to prepare workplans for these evaluations until there is sufficient data to conduct the evaluations.</p>



In 2021, language was added to the TRM to specify that existing condition baseline parameters may be substituted for TRM baseline inputs when calculating savings for LMI residences. In addition to this alignment of prescriptive TRM calculations with LMI existing conditions, project-specific existing condition parameters can be used in custom savings calculations. Additional guidance on use of existing condition baselines in AMEEP is outlined in the AMEEP Program Manual.

**1-4 Family Homes:** For the EmPower NY program, the Program Administrators' EM&V teams have aligned on which evaluation results would be applied to each program year. NYSERDA recently completed a 2017-Q1 2019 Gross Savings Analysis evaluation, which will serve as the initial VGS RR. Results shall be applied retrospectively starting in 2017 and will remain in place until a subsequent Gross Savings Analysis, as needed. With the anticipated launch of EmPower+ in 2023, a Gross Savings Analysis will be undertaken in 2024 and results will apply to the program from EmPower+ launch onwards. Until completion of this EmPower+ evaluation, the Program Administrators will use 62% for electric programs and 73% for gas programs as placeholder "adjustment factors" for internal statewide planning and forecasting purposes only. These adjustment factors reflect the results of the recently completed 2017-Q1 2019 evaluation, and are to be used for these planning and forecasting purposes as they reflect the optimal available information.

**Multifamily:** The Program Administrators revised the VGS Specification for the multifamily sector to align with the development of the new Statewide multifamily program launched in November 2021 (AMEEP).

The Program Administrators have decided to evaluate AMEEP with a joint statewide evaluation, beginning with an evaluation of the 2022 program year in 2023. Upon completion of the AMEEP evaluation, those results will be retroactively applied beginning January 1, 2022. Until completion of this evaluation, the Program Administrators will use a 70% placeholder "adjustment factor" for internal statewide planning and forecasting purposes only. The Program Administrators will use company-specific evaluation results for multifamily programs run prior to AMEEP in 2020 and 2021.

**New Construction:** Program areas offering incentives are undergoing Gross Savings Analysis for the program period 2017-2020. A contractor was procured by NYSERDA in Q1 2021 to perform this analysis. Details related to the Gross Savings Analysis methodology were submitted in an EM&V Plan in Q1 2021. The estimated completion of the Gross Savings Analysis report is Q1 2024.

**Additional LMI Initiatives:** An impact evaluation for Con Edison's Efficiency Starter program is forthcoming, with an expected evaluation plan

	<p>submission of Q3 2022. The final results are anticipated to be published by Q4 2023. Orange and Rockland’s Efficiency Starter program will start in 2022.</p> <p>An initial impact evaluation was performed for Central Hudson’s <b>Community Lighting</b> program for the 2018-2019 program year by Demand Side Analytics. The final Report was filed on July 1, 2021.</p>
Full Implementation	<p>Full implementation of EM&amp;V will entail a fully coordinated Statewide EM&amp;V approach, with a focus on achieving cost efficiencies and optimally leveraging information across Program Administrators. A foundational element of this statewide EM&amp;V approach is the establishment of VGS Specifications that cover the EM&amp;V activity and applications for all Program Administrators Statewide. Such specifications were developed and then initially filed in December 2020, and since that time, the Program Administrators have continued EM&amp;V coordination and progress towards full implementation (including filing of updated specifications concurrently with this Plan).</p> <p>Per the VGS Specifications, in the case where one Program Administrator is implementing a program on behalf of other Program Administrators, as in the case of EmPower NY, the implementing Program Administrator will take primary ownership of evaluation activities. In the case of AMEEP, where Program Administrators are jointly operating the program using a statewide framework, Program Administrators will collaborate to perform a statewide evaluation.</p> <p>Program Administrators plan to develop average existing condition baselines, facilitated through the TRM Management Committee, to allow for a uniform deemed savings approach for common prescriptive measures within the Statewide LMI Portfolio, either at a statewide or more granular level depending on availability of data and measure-specific characteristics.</p> <p><b>1-4 Family Homes:</b> As the 1-4 Family Homes programs are shifted from separate Empower NY and AHP programs to the combined Empower+ program, the Program Administrators will update the VGS activities and the VGS Specification to reflect this shift.</p> <p><b>Multifamily:</b> AMEEP was launched Statewide in November 2021. The Program Administrators will evaluate AMEEP with a joint statewide evaluation, with the aim of beginning an evaluation of the 2022 program year in 2023 if there is sufficient data. Evaluation efforts will continue to assess needs as the program evolves, such as any coordination between AMEEP and NYS Clean Heat.</p> <p><b>New Construction:</b> As additional New Construction initiatives are developed and implemented, necessary evaluation activities will be undertaken.</p>

	<b>Additional LMI Initiatives:</b> As Additional LMI Initiatives are developed and implemented, necessary evaluation activities will be undertaken.
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***Implementation Milestones (2022-2023)***

Year	Milestone	Status
2022	<ul style="list-style-type: none"> <li>• Continued ongoing meetings between Program Administrator VGS teams</li> <li>• Refine and finalize standardized survey questions to be used when conducting process evaluation research</li> <li>• Complete 2017-Q1 2019 evaluation of EmPower NY Program, on target to be finished by NYSERDA in Q2 2022</li> <li>• Begin to develop and implement average existing condition baselines, facilitated through the TRM Management Committee, and identify key LMI measures for further research</li> </ul>	In Progress
	<ul style="list-style-type: none"> <li>• Select EM&amp;V vendor for AMEEP evaluations to be undertaken in 2023</li> <li>• Assess impact of NYS Clean Heat coordination with AMEEP and any resulting evaluation needs</li> </ul>	Planning
2023	<ul style="list-style-type: none"> <li>• Begin EmPower+ evaluation process</li> <li>• Develop the workplan and conduct statewide evaluation for AMEEP, as operated in 2022</li> </ul>	Future

## Appendix A: Budgets by Sector<sup>115</sup>

### A.1 Portfolio-Level Budgets by Sector (\$000)

Initiative	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes	53,970	73,892	98,547	42,115	26,537	28,104						323,165
Existing Affordable Multifamily Programs	17,732	24,819	34,993	60,737	96,444	101,004	30,196	23,778	600			390,304
Affordable New Construction	5,034	6,617	11,395	6,570	18,001	25,738	31,270	23,080	17,615			145,319
Customer Awareness, Outreach & Engagement	3,225	1,029	9,009	16,084	15,316	15,132	10,126					69,921
Pilots and Demonstrations			213	639	398	398	398	398				2,444
Beneficial Electrification	13	3,845	2,280	4,580	5,637	8,233	5,412					30,000
LMI Solar	1,283	895	1,300	1,300	1,248	1,200	1,187	1,100	1,100	1,100		11,713
Healthy Homes Pilot	921	285	624	3,813	3,591	591						9,825
Portfolio Administration	284	1,303	2,418	2,657	2,874	2,793						12,330
Portfolio EM&V	509	669	1,005	1,923	2,246	2,028						8,379
<b>Total</b>	<b>82,969</b>	<b>113,354</b>	<b>161,783</b>	<b>140,419</b>	<b>172,292</b>	<b>185,220</b>	<b>78,589</b>	<b>48,356</b>	<b>19,315</b>	<b>1,100</b>		<b>1,003,399</b>

<sup>115</sup> In general, marketing costs are included in the Portfolio Administration category of budgets in this Plan. For NYSEG RG&E, NYSERDA, and National Grid marketing costs are included in program implementation costs.

## A.2 Portfolio Budgets Summary by Sector (\$000)

Initiative	Total	Percentage of Portfolio
Existing 1-4 Family Homes	323,165	32%
Existing Affordable Multifamily Programs (including Multifamily-related Affordable New Construction)	521,091	52%
Affordable New Construction (non-Multifamily)	14,532	1%
Customer Awareness, Outreach & Engagement	69,921	7%
Pilots and Demonstrations	2,444	0%
Beneficial Electrification	30,000	3%
LMI Solar	11,713	1%
Healthy Homes Pilot	9,825	1%
Portfolio Administration	12,330	1%
Portfolio EM&V	8,379	1%
<b>Total</b>	<b>1,003,399</b>	

## A.3 Utility Incremental LMI NE: NY Funding Allocated to Existing Affordable Multifamily Buildings

2020 - 2025	
Incremental LMI NE: NY funding allocated to Affordable Multifamily	\$206,190,465
Total incremental LMI NE: NY funding	\$308,357,232
<b>Percentage of incremental LMI NE: NY funding allocated to Affordable Multifamily<sup>116</sup></b>	<b>67%</b>

<sup>116</sup> The Accelerated Efficiency Order directed that at a minimum, 40% of the collective incremental LMI funding be committed to serving affordable multifamily buildings. The funding in this table represents the allocated utility incremental LMI funding from the Accelerated Efficiency Order and the 2020 NE: NY Order. This funding does not include additional utility funding that will be transferred into the Statewide LMI Portfolio from Central Hudson, NFGDC, National Grid (KEDLI), NYSEG, and RG&E (refer to [Section 3](#) for details on additional funding).

#### A.4 Additional or Redirected Funds

Program Administrator <sup>117</sup>	Amount	Portfolio Transferred From	Portfolio Transferred To	Associated Time Period	Description
Central Hudson	\$182,135	Market Rate NE: NY	LMI	2023-2025 <sup>118</sup>	Expenditure will be offset by a corresponding underspend of the cumulative authorized budgets for non-LMI Energy Efficiency programs
Con Edison	\$18,268,048	LMI	LMI	2020-2025	Upon achievement of ordered electric targets, remaining LMI NE: NY electric funds will be transferred to gas in support of increased demand for gas efficiency measures
National Fuel Gas Distribution Company	\$34,739,656	Rate Case Funding: Case 07-G-0141	LMI	2020-2025	LIURP funds directed to LMI 1-4 Family Homes, Multifamily, and Customer Awareness, Outreach & Engagement initiatives
National Grid (KEDLI)	\$10,000,000	Rate Case Funding: Case 19-G-0310	LMI	2020-2023	Rate case funding has been designated to support the KEDLI HEAT program in the 1-4 Family Homes portfolio for program years 2020-2023. Additional Dth savings target has been added to the KEDLI LMI portfolio in concert with this rate case funding.

<sup>117</sup> KEDNY, NMPC, NYSEDA, and Orange & Rockland do not plan to incorporate additional funding or shift funds between electric and gas over the course of the portfolio.

<sup>118</sup> Additional funding forecasted to meet ordered targets.

## Appendix B: Utility LMI Ordered vs Planned Budgets and Benefits

### B.1 Utility Electric LMI Ordered vs Planned Budgets and Benefits<sup>119</sup>

Company		2020-2025 Electric Budget	2020-2025 Savings Benefit (MWh)
Central Hudson	LMI Implementation Plan	807,522	1,972
	NENY Order(s)	910,438	1,579
	Difference	-102,916	393
	Difference (%)	-12%	22%
Con Edison	LMI Implementation Plan	43,381,887	106,935
	NENY Order(s)	61,649,935	106,935
	Difference	-18,268,048	0
	Difference (%)	-35%	0%
NMPC	LMI Implementation Plan	8,900,079	15,495
	NENY Order(s)	8,900,079	15,439
	Difference	0	56
	Difference (%)	0%	0%
New York State Electric & Gas (NYSEG)	LMI Implementation Plan	10,296,587	22,846
	NENY Order(s)	10,296,587	17,862
	Difference	0	4,984
	Difference (%)	0%	24%
Orange & Rockland	LMI Implementation Plan	2,321,659	4,027
	NENY Order(s)	2,321,659	4,027
	Difference	0	0
	Difference (%)	0%	0%
Rochester Gas & Electric (RG&E)	LMI Implementation Plan	5,243,397	10,131
	NENY Order(s)	5,243,397	9,096
	Difference	0	1,035
	Difference (%)	0%	11%

<sup>119</sup> Table includes 2019 NE: NY ordered budget and targets, as applicable by Program Administrator.

## B.2 Utility Gas LMI Ordered vs Planned Budgets and Benefits

Company		2020-2025 Gas Budget	2020-2025 Savings Benefits (MMBtu)
Central Hudson	LMI Implementation Plan	2,409,407	11,189
	NENY Order(s)	2,124,356	19,667
	Difference	285,051	-8,478
	Difference (%)	13%	-55%
Con Edison	LMI Implementation Plan	134,299,375	1,223,429
	NENY Order(s)	116,031,327	1,074,165
	Difference	18,268,048	149,264
	Difference (%)	15%	13%
KEDLI	LMI Implementation Plan	30,101,131	155,221
	NENY Order(s) <sup>120</sup>	30,101,131	278,667
	Difference	0	-123,446
	Difference (%)	0%	-57%
KEDNY	LMI Implementation Plan	24,395,776	123,773
	NENY Order(s)	24,395,776	225,844
	Difference	0	-102,071
	Difference (%)	0%	-58%
National Fuel Gas	LMI Implementation Plan	38,495,972	278,827
	NENY Order(s) <sup>121</sup>	42,130,455	409,257
	Difference	-3,634,483	-130,430
	Difference (%)	-9%	-38%
NMPC	LMI Implementation Plan	20,766,851	110,217
	NENY Order(s)	20,766,851	192,251
	Difference	0	-82,034
	Difference (%)	0%	-54%
New York State Electric & Gas (NYSEG)	LMI Implementation Plan	18,894,023	92,560
	NENY Order(s)	18,894,023	174,910
	Difference	0	-82,350
	Difference (%)	0%	-62%

<sup>120</sup> Includes additional rate case funding and benefits for KEDLI.

<sup>121</sup> Includes additional rate case funding for National Fuel Gas.



Orange & Rockland	LMI Implementation Plan	3,711,702	34,362
	NENY Order(s)	3,711,702	34,362
	Difference	0	0
	Difference (%)	0%	0%
Rochester Gas & Electric (RG&E)	LMI Implementation Plan	9,253,656	53,651
	NENY Order(s)	9,253,656	85,666
	Difference	0	-32,015
	Difference (%)	0%	-46%

### B.3 NYSERDA LMI Budget and Benefit Targets vs Planned Budgets and Benefits

Metric	LMI Implementation Plan	Target	Difference	Difference (%)
Total Budget* (\$)	650,119,857	726,066,776	5,933,224	1%
MWh Annual Savings	355,028	356,498	-1,470	0%
MMBtu Annual Savings	8,693,166	8,908,710	-215,544	-2%
<p>*NYSERDA currently manages and reports Administration, EM&amp;V, and NYS Cost Recovery Fees at a broader Clean Energy Fund Market Development Portfolio (“CEF Market Development Portfolio” or “CEF”) level. To ensure that LMI expenditures and impact achievements can be assessed comprehensively, DPS has established the following LMI allocations for these costs: Administration + EM&amp;V: 27%; Market Development Cost Recovery Fee: 26%. These allocations increase NYSERDA’s total Implementation Plan to \$732M.</p>				

## Appendix C: Budgets and Benefits by Program Administrator

### C.1 Central Hudson

In an effort to maximize participation in AMEEP, Central Hudson is currently planning to exceed the minimum cumulative gas LMI portfolio spending of \$2,124,356 established within the 2020 NE: NY Order by \$285,051. Utilizing the flexibility provided within the 2020 NE: NY Order, this additional expenditure will be offset by a corresponding underspend in electric LMI, electric non-LMI, and/or gas non-LMI programs. Total expenditures across all portfolios are forecasted to come in at the total amount authorized in the 2020 NE: NY Order. Refer to Appendix A in the Statewide LMI Program 2021 Annual Report for additional details regarding Central Hudson’s 2021 budgets and benefits.

Electric Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			80,954	80,403	98,686	172,598	432,641
Program Implementation			7,206	10,308	12,652	22,128	52,294
<b>Total Budget</b>			<b>88,160</b>	<b>90,711</b>	<b>111,338</b>	<b>194,726</b>	<b>484,935</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services				44,711	56,045	74,878	175,634
Program Implementation				12,250	15,355	20,514	48,119
<b>Total Budget</b>				<b>56,961</b>	<b>71,400</b>	<b>95,392</b>	<b>223,753</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services				1,735	1,735	1,735	5,205
Program Implementation							
<b>Total Budget</b>				<b>1,735</b>	<b>1,735</b>	<b>1,735</b>	<b>5,205</b>
Portfolio Administration				16,493	17,335	24,835	58,663
Portfolio EM&V				8,825	10,812	15,328	34,966
<b>Total Portfolio Budget</b>			<b>88,160</b>	<b>174,726</b>	<b>212,620</b>	<b>332,017</b>	<b>807,522</b>

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			217,564	184,660	215,922	286,278	904,425
Program Implementation			21,522	23,674	27,682	36,702	109,581
<b>Total Budget</b>			<b>239,086</b>	<b>208,335</b>	<b>243,604</b>	<b>322,980</b>	<b>1,014,005</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services				260,100	333,450	461,430	1,054,980
Program Implementation				40,460	51,870	71,778	164,108
<b>Total Budget</b>				<b>300,560</b>	<b>385,320</b>	<b>533,208</b>	<b>1,219,088</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
Portfolio Administration				28,523	30,862	37,952	97,337
Portfolio EM&V				20,884	25,534	32,558	78,977
<b>Total Portfolio Budget</b>			<b>239,086</b>	<b>558,302</b>	<b>685,320</b>	<b>926,699</b>	<b>2,409,407</b>

<b>Electric Savings Benefits Distribution (MWh)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			51	49	61	106	266
Existing Affordable Multifamily Buildings				71	90	120	281
Affordable New Construction							
Customer Awareness, Outreach & Engagement			604	273	273	273	1,424
<b>Total</b>			<b>655</b>	<b>394</b>	<b>424</b>	<b>499</b>	<b>1,972</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			635	631	738	979	2,983
Existing Affordable Multifamily Buildings				2,023	2,594	3,589	8,206
Affordable New Construction							
Customer Awareness, Outreach & Engagement							
<b>Total</b>			<b>635</b>	<b>2,654</b>	<b>3,332</b>	<b>4,568</b>	<b>11,189</b>

## C.2 Con Edison

Con Edison's forecast is based on the goals of meeting or exceeding the targets outlined in the NE: NY order as well as the desire not to turn away qualifying projects based on the current incentive design. The current design provides a larger incentive for LMI customers, which is necessary for them to be able to participate in the program compared to non-LMI participants. Con Edison projects to overachieve ordered total savings targets by 10% at the end of the 2020–2025 period. Gas is projected to exceed ordered targets by 14% and electric is projected to meet targets.

The forecast reflects a shifting in the Company's focus from behavioral programs and lighting programs towards more substantial and expensive measures such as improving building envelopes. While the Company expects that the unit cost for multifamily will increase over time as the program focuses on achieving deep energy retrofit savings, projected unit costs for implementing the LMI portfolio will come in 9% lower than ordered unit costs.<sup>122</sup>

Con Edison saw a particular growth in market demand for multifamily gas program incentives in early 2022, as exemplified by the spike in multifamily gas savings in 2022. This spike was caused by lowering non-comprehensive incentives at the beginning of 2022 to accommodate enhanced incentive levels for the new comprehensive offering. The market received notice of the incentive decrease with the launch of AMEEP and was given a two-month transition period, which led to an influx of applications for non-comprehensive gas projects prior to the official incentive change in 2022.

The Company expects that same demand to increase further in 2023 and 2024. To meet this demand, Con Edison plans to pull funds forward from 2025 into earlier years. Additionally, once electric targets have been achieved, Con Edison plans to shift remaining electric funds over to gas to support the overachievement in savings for that commodity. While this will allow the Company to support all the qualifying projects it expects in 2022, 2023, and 2024, there may not be enough funds left in 2025 to meet the expected need, based on the current budget. Therefore, the forecast shows a decrease in spending in 2025 as funds run low.

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<sup>122</sup> Lower-cost Home Energy Reports and retail lighting combined with anticipated multifamily comprehensive project completions between 2023 and 2025 result in a forecasted reduction in total electric portfolio unit costs as compared to total ordered electric portfolio unit costs. Electric spend and achievement projections further account for an expected decrease in lighting savings resulting from the Energy Independence and Security Act beginning in 2023.

The forecast presented in the Implementation Plan does not include integrating LMI building electrification efforts with AMEEP. With the addition of building electrification, it is expected that both savings and spending will increase. This may lead to the need for additional funding in order to meet the projected demand for projects serving LMI customers. The Company will seek to address this issue during the NE: NY Interim Review. During the Interim Review, the Company will seek additional funds to meet the Climate Act goal of providing 35% of program benefits to support disadvantaged communities. Additionally, the forecast presented here is aligned with the directive in the NE: NY Order for 20% of utility incremental funds to be spent on LMI energy efficiency programs.

<b>Electric Budget Distribution (\$)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			202,800	265,200	343,200	468,000	1,279,200
Program Implementation			26,000	34,000	44,000	60,000	164,000
<b>Total Budget</b>			<b>228,800</b>	<b>299,200</b>	<b>387,200</b>	<b>528,000</b>	<b>1,443,200</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services	3,187,222	2,278,778	3,448,637	4,730,122	6,674,681	6,573,012	26,892,452
Program Implementation	461,955	538,641	518,433	575,437	669,333	581,434	3,345,234
<b>Total Budget</b>	<b>3,649,178</b>	<b>2,817,419</b>	<b>3,967,070</b>	<b>5,305,559</b>	<b>7,344,014</b>	<b>7,154,447</b>	<b>30,237,686</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services	1,130,560	17,086	726,636	761,676	761,676	704,199	4,101,833
Program Implementation	1,097,967	166,459	207,138	330,361	330,361	267,425	2,399,711
<b>Total Budget</b>	<b>2,228,527</b>	<b>183,545</b>	<b>933,774</b>	<b>1,092,037</b>	<b>1,092,037</b>	<b>971,624</b>	<b>6,501,544</b>
Portfolio Administration	176,444	546,817	1,054,330	834,330	917,763	558,148	4,087,833
Portfolio EM&V	318,925	188,872	144,456	173,348	190,682	95,341	1,111,624
<b>Total Portfolio Budget</b>	<b>6,373,073</b>	<b>3,736,654</b>	<b>6,328,430</b>	<b>7,704,474</b>	<b>9,931,696</b>	<b>9,307,560</b>	<b>43,381,887</b>

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			682,500	853,125	1,066,406	1,333,008	3,935,039
Program Implementation			87,500	109,375	136,719	170,898	504,492
<b>Total Budget</b>			<b>770,000</b>	<b>962,500</b>	<b>1,203,125</b>	<b>1,503,906</b>	<b>4,439,531</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services	3,066,284	10,816,538	18,761,754	20,407,761	27,476,722	21,463,964	101,933,023
Program Implementation	865,848	2,808,057	3,980,609	4,163,266	5,274,253	3,537,791	20,629,824
<b>Total Budget</b>	<b>3,932,132</b>	<b>13,624,595</b>	<b>22,742,363</b>	<b>24,571,027</b>	<b>32,750,975</b>	<b>25,001,755</b>	<b>122,622,847</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services	326,144	9,669	26,512	26,512	26,512	6,628	421,977
Program Implementation	474,685	6,314	17,339	17,339	17,339	4,335	537,352
<b>Total Budget</b>	<b>800,829</b>	<b>15,983</b>	<b>43,851</b>	<b>43,851</b>	<b>43,851</b>	<b>10,963</b>	<b>959,329</b>
Portfolio Administration	86,956	659,442	878,523	636,376	700,013	350,007	3,311,316
Portfolio EM&V	181,514	480,203	528,586	634,303	761,164	380,582	2,966,351
<b>Total Portfolio Budget</b>	<b>5,001,431</b>	<b>14,780,223</b>	<b>24,963,324</b>	<b>26,848,057</b>	<b>35,459,128</b>	<b>27,247,212</b>	<b>134,299,375</b>

<b>Electric Savings Benefits Distribution (MWh)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			123	185	239	326	874
Existing Affordable Multifamily Buildings	3,950	4,047	5,843	7,105	7,613	6,259	34,817
Affordable New Construction							
Customer Awareness, Outreach & Engagement	34,594	9,317	10,040	5,830	5,830	5,632	71,243
<b>Total</b>	<b>38,544</b>	<b>13,363</b>	<b>16,006</b>	<b>13,121</b>	<b>13,682</b>	<b>12,218</b>	<b>106,935</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			2,762	3,314	4,143	5,179	15,398
Existing Affordable Multifamily Buildings	62,348	202,174	236,950	226,283	271,539	172,061	1,171,356
Affordable New Construction							
Customer Awareness, Outreach & Engagement	32,374	370	1,210	1,210	1,210	302	36,675
<b>Total</b>	<b>94,722</b>	<b>202,544</b>	<b>240,922</b>	<b>230,087</b>	<b>276,892</b>	<b>177,542</b>	<b>1,223,429</b>



### C.3 KEDLI<sup>123</sup>

The budgets and benefits presented here differ from the funding allocated in the 2020 NE: NY Order because additional funding and savings benefits have been added to the portfolio, as approved in KEDLI's most recent rate case, to support the HEAT program. Previously the HEAT program was funded solely through the Company's rate cases, but in order to better align with statewide efforts, is now incorporated into the Statewide LMI Portfolio.

The forecasted budgets and benefits below are based off the Company's plan to fully spend the allocated budgets to support LMI customers. However, between the programs currently existing in market, planned modifications, and upcoming initiatives, KEDLI is not currently forecasting that it will reach the ordered savings target. The reasons include the challenges described above in the Executive Summary, such as supply chain, inflationary pressures, material and labor costs, as well as historically low participation rates. These forecasts reflect what the Company views as most realistic, and work will continue towards acquiring savings to bring the portfolio closer to achieving its goal. Efforts to achieve more energy savings are described in more detail in the program descriptions within the body of this plan. In summary, KEDLI will continue to expand the KEDLI HEAT program to serve more moderate-income customers and will work to align the offering with EmPower+, increase marketing and outreach efforts for the multifamily sector to spur more participation in AMEEP, develop and launch community-based initiatives to expand awareness of LMI program offerings, and develop relationships with relevant program administrators such as PSEG LI.

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<sup>123</sup> KEDLI 2020 and 2021 gas spend and savings have been updated from the values filed in the May 31, 2022, Implementation Plan to reflect corrections filed in the National Grid Notice of Errata to the Q2 2022 Clean Energy Dashboard Scorecard Report, filed on October 26, 2022, in case 18-M-0084 and 15-M-0252.

<b>Gas Budget Distribution (\$)</b>							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services	1,152,184	1,044,955	3,279,701	3,277,744	4,057,606	4,514,584	17,326,774
Program Implementation	378,391	360,136	570,825	1,007,685	1,247,440	1,387,930	4,952,406
<b>Total Budget</b>	<b>1,530,575</b>	<b>1,405,091</b>	<b>3,850,525</b>	<b>4,285,429</b>	<b>5,305,046</b>	<b>5,902,514</b>	<b>22,279,180</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services				899,500	1,050,000	1,155,200	3,104,700
Program Implementation				321,250	375,000	412,571	1,108,821
<b>Total Budget</b>				<b>1,220,750</b>	<b>1,425,000</b>	<b>1,567,771</b>	<b>4,213,521</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services				558,275	400,000	425,000	1,383,275
Program Implementation			70,719	461,423	445,738	356,482	1,334,362
<b>Total Budget</b>			<b>70,719</b>	<b>1,019,698</b>	<b>845,738</b>	<b>781,482</b>	<b>2,717,637</b>
Portfolio Administration	20,364	4,921	1,113	48,259	53,114	51,546	179,317
Portfolio EM&V	8,109			198,746	242,260	262,361	711,476
<b>Total Portfolio Budget</b>	<b>1,559,048</b>	<b>1,410,012</b>	<b>3,922,357</b>	<b>6,772,882</b>	<b>7,871,158</b>	<b>8,565,674</b>	<b>30,101,131</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes	3,549	7,749	20,233	23,268	28,804	32,048	115,650
Existing Affordable Multifamily Buildings				5,997	7,000	7,701	20,698
Affordable New Construction							
Customer Awareness, Outreach & Engagement				7,617	5,457	5,799	18,873
<b>Total</b>	<b>3,549</b>	<b>7,749</b>	<b>20,233</b>	<b>36,882</b>	<b>41,261</b>	<b>45,548</b>	<b>155,221</b>

## C.4 KEDNY

The forecasted budgets and benefits below are based off the Company's plan to fully spend the allocated budgets to support LMI customers. However, between the programs currently existing in market, planned modifications, and upcoming initiatives, KEDNY is not currently forecasting to reach the ordered target. Reasons include the challenges described above in the Executive Summary, such as supply chain, inflationary pressures, material and labor costs, as well as a slower ramp up in completed projects in AMEEP. These forecasts reflect what the Company views as most realistic at this point, and work will continue towards accruing savings to bring the portfolio closer to achieving its goal. Efforts to achieve additional savings are described in more detail in the program descriptions within the body of this plan.

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			900,001	399,218	422,517	580,477	2,302,212
Program Implementation			84,616	164,918	174,544	239,798	663,876
<b>Total Budget</b>			<b>984,617</b>	<b>564,136</b>	<b>597,061</b>	<b>820,275</b>	<b>2,966,088</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services			340,886	4,044,381	4,719,381	5,520,727	14,625,375
Program Implementation				1,159,389	1,352,889	1,582,608	4,094,886
<b>Total Budget</b>			<b>340,886</b>	<b>5,203,770</b>	<b>6,072,270</b>	<b>7,103,335</b>	<b>18,720,261</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services				230,400	268,800	307,200	806,400
Program Implementation			83,815	107,458	108,116	110,371	409,760
<b>Total Budget</b>			<b>83,815</b>	<b>337,858</b>	<b>376,916</b>	<b>417,571</b>	<b>1,216,160</b>
Portfolio Administration			84,616	81,126	89,664	503,783	759,189
Portfolio EM&V			84,616	184,030	213,076	252,355	734,077
<b>Total Portfolio Budget</b>			<b>1,578,550</b>	<b>6,370,920</b>	<b>7,348,987</b>	<b>9,097,319</b>	<b>24,395,776</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			3,720	1,551	1,641	2,255	9,167
Existing Affordable Multifamily Buildings			2,020	29,037	36,706	46,843	114,606
Affordable New Construction							
Customer Awareness, Outreach & Engagement							
<b>Total</b>			<b>5,740</b>	<b>30,588</b>	<b>38,347</b>	<b>49,098</b>	<b>123,773</b>

## C.5 National Fuel Gas

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services	4,563,489	3,537,952	8,660,293	4,903,523	4,713,904	4,737,277	31,116,438
Program Implementation		368,180	352,763	896,606	872,295	875,292	3,365,136
<b>Total Budget</b>	<b>4,563,489</b>	<b>3,906,132</b>	<b>9,009,456</b>	<b>5,800,129</b>	<b>5,586,200</b>	<b>5,612,569</b>	<b>34,477,974</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services				405,841	502,378	568,953	1,477,172
Program Implementation			3,600	102,163	128,033	146,726	380,522
<b>Total Budget</b>			<b>3,600</b>	<b>508,004</b>	<b>630,411</b>	<b>715,679</b>	<b>1,857,694</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
Portfolio Administration				556,323	531,040	549,683	1,637,046
Portfolio EM&V				178,982	171,689	172,588	523,258
<b>Total Portfolio Budget</b>	<b>4,563,489</b>	<b>3,906,132</b>	<b>9,013,056</b>	<b>7,043,437</b>	<b>6,919,339</b>	<b>7,050,518</b>	<b>38,495,972</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes	31,411	22,093	40,529	47,169	50,789	55,526	247,517
Existing Affordable Multifamily Buildings			6,891	7,288	8,264	8,867	31,310
Affordable New Construction							
Customer Awareness, Outreach & Engagement							
<b>Total</b>	<b>31,411</b>	<b>22,093</b>	<b>47,420</b>	<b>54,457</b>	<b>59,053</b>	<b>64,393</b>	<b>278,827</b>

## C.6 New York State Energy Research & Development Authority

As part of the Performance Management & Improvement Process established by DPS, NYSERDA revises the forecast of all CEF initiatives in the Compiled Investment Plans (CIP) November 1 filing annually (the reforecast). Each initiative’s budget and benefit values have been updated to reflect NYSERDA’s best understanding at this time, including actual progress reported for past years alongside adjustments to future year projections where necessary.<sup>124</sup> The implications of the EISA standard for light bulbs effective Jan. 2023 are being explored and should be addressed through the TRM Management Committee for all sectors, including LMI.

### C.6.1 CEF Budget Expenditures

CEF Budget Distribution (\$000)												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
<b>Existing 1-4 Family Homes</b>												
Incentives & Services	40,581	59,449	64,889	15,036	2,416							182,370
Program Implementation	6,560	7,356	13,000	6,352	418							33,687
Research and Technology Studies				150								400
Tools, Training, and Replication		8	25	354	86							473
Business Support			50	275	25							350
<b>Total Budget</b>	<b>47,141</b>	<b>66,813</b>	<b>77,964</b>	<b>22,167</b>	<b>2,945</b>							<b>217,030</b>
<b>Existing Affordable Multifamily Buildings</b>												
Incentives & Services	7,011	5,513	4,398	13,578	30,739	41,404	25,519	21,944				150,107
Program Implementation	2,317	2,045	2,007	3,004	4,730	3,003	2,109	1,074				20,289
Research and Technology Studies				600	600	600	600	600	600			3,000
Tools, Training, and Replication	44	492	1,155	1,514	2,436	2,371	1,967	159				10,137
<b>Total Budget</b>	<b>9,372</b>	<b>8,049</b>	<b>7,559</b>	<b>18,096</b>	<b>38,504</b>	<b>47,378</b>	<b>30,196</b>	<b>23,778</b>	<b>600</b>			<b>183,533</b>
<b>Affordable New Construction</b>												

<sup>124</sup> <https://www.nyserdera.ny.gov/About/Funding/Clean-Energy-Fund>

CEF Budget Distribution (\$000)											
Incentives & Services	4,097	5,455	10,470	5,550	16,583	24,252	29,861	22,000	16,865		135,132
Program Implementation	726	773	713	470	468	286	200	70			3,706
Tools, Training, and Replication	211	389	212	550	950	1,200	1,209	1,009	750		6,481
<b>Total Budget</b>	<b>5,034</b>	<b>6,617</b>	<b>11,395</b>	<b>6,570</b>	<b>18,001</b>	<b>25,738</b>	<b>31,270</b>	<b>23,080</b>	<b>17,615</b>		<b>145,319</b>
<b>Customer Awareness, Outreach &amp; Engagement</b>											
Incentives & Services	156	471	531	525	758	1,064	548				4,052
Program Implementation	15	304	1,561	1,619	1,496	1,156	868				7,018
Tools, Training, and Replication	25	55	4,242	8,723	8,716	8,716	8,710				39,187
<b>Total Budget</b>	<b>195</b>	<b>829</b>	<b>6,334</b>	<b>10,867</b>	<b>10,970</b>	<b>10,936</b>	<b>10,126</b>				<b>50,257</b>
<b>Pilots and Demonstrations</b>											
Tools, Training, and Replication			213	639	398	398	398	398			2,444
<b>Total Budget</b>			<b>213</b>	<b>639</b>	<b>398</b>	<b>398</b>	<b>398</b>	<b>398</b>			<b>2,444</b>
<b>LMI Solar</b>											
Incentives & Services	1,093	821	1,200	1,200	1,148	1,100	1,100	1,100	1,100	1,100	10,962
Program Implementation	189	74	100	100	100	100	87				750
<b>Total Budget</b>	<b>1,283</b>	<b>895</b>	<b>1,300</b>	<b>1,300</b>	<b>1,248</b>	<b>1,200</b>	<b>1,187</b>	<b>1,100</b>	<b>1,100</b>	<b>1,100</b>	<b>11,713</b>
<b>Electrification</b>											
Incentives & Services		3,043	2,000	4,000	5,000	7,699	4,912				26,655
Program Implementation	13	789	250	380	380	283	250				2,345
Tools, Training, and Replication		13	30	200	257	250	250				1,000
<b>Total Budget</b>	<b>13</b>	<b>3,845</b>	<b>2,280</b>	<b>4,580</b>	<b>5,637</b>	<b>8,233</b>	<b>5,412</b>				<b>30,000</b>
<b>Healthy Homes VBP</b>											
Incentives & Services		4	17	116							137
Program Implementation	56	81	9	75	75	69					365
Research and Technology Studies	865	200	598	3,622	3,516	522					9,322
<b>Total Budget</b>	<b>921</b>	<b>285</b>	<b>624</b>	<b>3,813</b>	<b>3,591</b>	<b>591</b>					<b>9,825</b>
<b>Total Portfolio Budget</b>	<b>63,959</b>	<b>87,334</b>	<b>107,668</b>	<b>68,031</b>	<b>81,294</b>	<b>94,473</b>	<b>78,589</b>	<b>48,356</b>	<b>19,315</b>	<b>1,100</b>	<b>650,120</b>



### C.6.2 Electric Savings

Electric Savings Benefits Distribution (MWh)												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes	2,214	4,304	4,259	1,002	115							11,894
Existing Affordable Multifamily Buildings	3,134	11,293	9,109	5,384	11,432	21,723	15,537	11,587				89,199
Affordable New Construction	2,346	3,717	2,960	3,000	11,079	16,090	14,850	14,332	14,475	3,857	1,929	88,635
Customer Awareness, Outreach & Engagement												
Pilots and Demonstrations												
Healthy Homes Pilot			15	150	135							300
<b>Total</b>	<b>7,694</b>	<b>19,314</b>	<b>16,343</b>	<b>9,536</b>	<b>22,761</b>	<b>37,813</b>	<b>30,387</b>	<b>25,919</b>	<b>14,475</b>	<b>3,857</b>	<b>1,929</b>	<b>190,028</b>

### C.6.3 Gas Savings

Gas Savings Benefits Distribution (MMBtu)												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes	96,474	149,364	133,464	31,779	5,670							416,751
Existing Affordable Multifamily Buildings	35,875	61,369	132,272	223,301	320,303	694,702	462,780	370,308				2,300,909
Affordable New Construction	39,517	36,222	29,000	32,150	86,848	117,413	99,675	84,857	73,250	20,357	10,179	629,468
Customer Awareness, Outreach & Engagement												
Pilots and Demonstrations												
Healthy Homes VBP			400	4,100	3,700							8,200
<b>Total</b>	<b>171,866</b>	<b>246,956</b>	<b>295,136</b>	<b>291,330</b>	<b>416,521</b>	<b>812,115</b>	<b>562,455</b>	<b>455,165</b>	<b>73,250</b>	<b>20,357</b>	<b>10,179</b>	<b>3,355,328</b>

#### C.6.4 Other Fuels Saving

Other Fuels Savings Benefits Distribution (MMBtu)												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes	52,852	78,726	60,837	14,851	4,568							211,833
Existing Affordable Multifamily Buildings	844	2,503	27,049	74,924	108,744	242,426	184,444	163,432				804,366
Affordable New Construction	1,945				2,303	2,438	3,175	3,571	2,750	1,071	536	17,789
Customer Awareness, Outreach & Engagement Pilots and Demonstrations												
Healthy Homes VBP			100	900	800							1,800
<b>Total</b>	<b>55,641</b>	<b>81,281</b>	<b>87,986</b>	<b>90,675</b>	<b>116,415</b>	<b>244,864</b>	<b>187,619</b>	<b>167,003</b>	<b>2,750</b>	<b>1,071</b>	<b>536</b>	<b>1,035,789</b>

#### C.6.5 Indirect Electric Savings

Indirect Electric Savings Benefits Distribution (MWh)*												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing Affordable Multifamily Buildings	-	-	982	3,842	4,020	5,849	12,051	14,971	19,205	25,498	31,826	118,244
Affordable New Construction	3,487	1,297	1,553	1,553	1,553	1,553	1,553	1,553	1,553	1,553	1,553	18,757
Healthy Homes VBP	96	-	-	-	-	-	-	2,429	-	-	25,475	28,000
<b>Total</b>	<b>3,583</b>	<b>1,297</b>	<b>2,535</b>	<b>5,395</b>	<b>5,573</b>	<b>7,402</b>	<b>13,603</b>	<b>18,952</b>	<b>20,758</b>	<b>27,051</b>	<b>58,854</b>	<b>165,001</b>
<b>*Indirect savings are discounted 50%</b>												

### C.6.6 Indirect Gas Savings

Indirect Gas Savings Benefits Distribution (MMBtu)*												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing Affordable Multifamily Buildings	-	-	38,654	124,187	158,732	220,128	306,036	322,556	357,937	443,099	524,580	2,495,907
Affordable New Construction	24,104	7,196	8,363	8,363	8,363	8,363	8,363	8,363	8,363	8,363	8,363	106,563
Healthy Homes VBP	2,560	-	-	-	-	-	-	64,640	-	-	680,800	748,000
<b>Total</b>	<b>26,664</b>	<b>7,196</b>	<b>47,016</b>	<b>132,549</b>	<b>167,095</b>	<b>228,490</b>	<b>314,398</b>	<b>395,559</b>	<b>366,300</b>	<b>451,462</b>	<b>1,213,743</b>	<b>3,350,470</b>
<b>*Indirect savings are discounted 50%</b>												

### C.6.7 Indirect Other Fuels Savings

Indirect Other Fuels Savings Benefits Distribution (MMBtu)*												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing Affordable Multifamily Buildings	-	-	9,663	37,732	46,368	75,983	96,657	100,787	109,631	130,923	151,704	759,449
Affordable New Construction	1,269	379	387	387	387	387	387	387	387	387	387	5,131
Healthy Homes VBP	640	-	-	-	-	-	-	16,160	-	-	170,200	187,000
<b>Total</b>	<b>1,909</b>	<b>379</b>	<b>10,050</b>	<b>38,119</b>	<b>46,755</b>	<b>76,370</b>	<b>97,044</b>	<b>117,334</b>	<b>110,018</b>	<b>131,310</b>	<b>322,291</b>	<b>951,579</b>
<b>*Indirect savings are discounted 50%</b>												

### C.7 New York State Electric & Gas (NYSEG)

Our planned expenditures align with the ordered targets. The planned savings do not align with the original ordered savings targets. This is due to misalignment of actual costs of the 1-4 family homes program compared to the targeted costs per savings in our orders (as described in section 3 of this plan). It should be noted that the actual costs of 1-4 family program appears to be in alignment with national costs/industry standard. The variance is also due to the low response rates to the AMEEP program. To offset those (savings) shortfalls we plan to bolster our Customer Awareness, Outreach and Engagement. These supplemental programs will cross promote Empower and AMEEP while providing additional savings to low-income consumers. This will help achieve targeted electric savings but will not meet the targeted gas savings.

<b>Electric Budget Distribution (\$)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
<b>Existing 1-4 Family Homes</b>							
Incentives & Services	382,682	368,025	390,452	832,799	1,196,885	1,632,344	4,803,187
Program Implementation	51,610	38,558	67,013	10,524	15,125	19,141	201,970
Tools, Training, and Replication	2,087	1,987					4,074
<b>Total Budget</b>	<b>436,380</b>	<b>408,569</b>	<b>457,464</b>	<b>843,323</b>	<b>1,212,010</b>	<b>1,651,485</b>	<b>5,009,231</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services	405,309	21,708	73,158	369,007	768,234	891,675	2,529,091
Program Implementation	36,779	39,083	16,795	4,831	10,058	12,816	120,362
Tools, Training, and Replication	1,392	1,324	326				3,042
<b>Total Budget</b>	<b>443,481</b>	<b>62,115</b>	<b>90,279</b>	<b>373,838</b>	<b>778,292</b>	<b>904,491</b>	<b>2,652,496</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services			358,945	797,386	262,702	277,510	1,696,543
Program Implementation			152,591	11,018	3,630	3,834	171,073
Tools, Training, and Replication			57,674				57,674
<b>Total Budget</b>			<b>569,210</b>	<b>808,404</b>	<b>266,332</b>	<b>281,344</b>	<b>1,925,290</b>
Portfolio Administration		24,229	48,545	77,094	74,458	97,618	321,944
Portfolio EM&V			53,069	117,801	94,806	121,950	387,626
<b>Total Portfolio Budget</b>	<b>879,861</b>	<b>494,913</b>	<b>1,218,567</b>	<b>2,220,460</b>	<b>2,425,898</b>	<b>3,056,888</b>	<b>10,296,587</b>

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services	46,651	637,378	983,982	1,965,618	2,825,673	3,863,421	10,322,723
Program Implementation	2,165	60,186	139,773	29,964	43,074	58,940	334,102
Tools, Training, and Replication	279	266					545
<b>Total Budget</b>	<b>49,095</b>	<b>697,830</b>	<b>1,123,755</b>	<b>1,995,582</b>	<b>2,868,747</b>	<b>3,922,361</b>	<b>10,657,369</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services	25,506	3,875	23,863	626,430	1,769,854	2,419,151	4,868,679
Program Implementation	3,025	50,227	39,567	43,351	122,480	167,020	425,670
Tools, Training, and Replication	186	177	1,271				1,634
<b>Total Budget</b>	<b>28,717</b>	<b>54,280</b>	<b>64,701</b>	<b>669,781</b>	<b>1,892,334</b>	<b>2,586,171</b>	<b>5,295,983</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services			60,508	611,207	635,659	700,613	2,007,987
Program Implementation			35,930	31,733	12,323	13,825	93,811
Tools, Training, and Replication							-
<b>Total Budget</b>			<b>96,438</b>	<b>642,940</b>	<b>647,982</b>	<b>714,438</b>	<b>2,101,798</b>
Portfolio Administration		33,776	113,366	51,098	76,413	107,574	382,227
Portfolio EM&V			37,785	86,376	138,802	193,682	456,645
<b>Total Portfolio Budget</b>	<b>77,812</b>	<b>785,885</b>	<b>1,436,044</b>	<b>3,445,777</b>	<b>5,624,278</b>	<b>7,524,226</b>	<b>18,894,023</b>

<b>Electric Savings Benefits Distribution (MWh)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes	384	220	251	669	780	1,067	3,371
Existing Affordable Multifamily Buildings	894	42	178	706	2,025	2,769	6,614
Affordable New Construction							
Customer Awareness, Outreach & Engagement			7,328	2,798	1,735	1,000	12,861
<b>Total</b>	<b>1,278</b>	<b>262</b>	<b>7,758</b>	<b>4,173</b>	<b>4,540</b>	<b>4,836</b>	<b>22,846</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes	158	2,613	3,292	6,634	9,275	12,371	34,343
Existing Affordable Multifamily Buildings	786	38	800	6,494	14,967	20,464	43,549
Affordable New Construction							
Customer Awareness, Outreach & Engagement			3,902	6,266	2,250	2,250	14,668
<b>Total</b>	<b>944</b>	<b>2,651</b>	<b>7,995</b>	<b>19,394</b>	<b>26,492</b>	<b>35,085</b>	<b>92,560</b>

## C.8 NMPC

The forecasted electric budgets and benefits below are based off the Company’s plan to fully spend the allocated budgets to support LMI customers. However, between the programs currently existing in market, planned modifications, and upcoming initiatives, NMPC Electric is not currently forecasting to reach the ordered target. The reasons include the challenges described above in the Executive Summary, such as supply chain, inflationary pressures, material and labor costs, as well as a slow ramp up in participation in AMEEP, and the new EISA standards’ impacts on lighting measures. These forecasts reflect what the Company views as most realistic at this point, and work will continue towards accruing savings to bring the portfolio closer to achieving its goal. Efforts to bring in more savings are described in more detail in the program descriptions within the body of this plan.

Electric Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			463,936	534,436	751,753	1,012,483	2,762,608
Program Implementation			59,277	153,467	215,871	290,742	719,357
<b>Total Budget</b>			<b>523,213</b>	<b>687,903</b>	<b>967,624</b>	<b>1,303,225</b>	<b>3,481,965</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services				672,308	859,256	1,141,572	2,673,136
Program Implementation				238,538	320,058	458,991	1,017,587
<b>Total Budget</b>				<b>910,846</b>	<b>1,179,314</b>	<b>1,600,563</b>	<b>3,690,723</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services			369,870	225,293	213,505	180,017	988,685
Program Implementation			31,431	35,938	30,656	25,893	123,918
<b>Total Budget</b>			<b>401,301</b>	<b>261,231</b>	<b>244,161</b>	<b>205,911</b>	<b>1,112,604</b>
Portfolio Administration			53,879	67,466	92,867	123,342	337,554
Portfolio EM&V			17,934	68,387	84,581	106,331	277,233
<b>Total Portfolio Budget</b>			<b>996,327</b>	<b>1,995,833</b>	<b>2,568,547</b>	<b>3,339,372</b>	<b>8,900,079</b>



Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			1,001,802	1,108,459	1,559,191	2,099,965	5,769,417
Program Implementation			94,186	318,302	447,733	603,020	1,463,241
<b>Total Budget</b>			<b>1,095,988</b>	<b>1,426,761</b>	<b>2,006,924</b>	<b>2,702,985</b>	<b>7,232,658</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services				2,043,850	2,873,215	3,404,428	8,321,493
Program Implementation				791,168	1,112,212	1,317,843	3,221,223
<b>Total Budget</b>				<b>2,835,018</b>	<b>3,985,427</b>	<b>4,722,271</b>	<b>11,542,716</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagements</b>							
Incentives & Services				108,857	142,857	151,357	403,071
Program Implementation			75,957	60,068	56,218	50,965	243,208
<b>Total Budget</b>			<b>75,957</b>	<b>168,925</b>	<b>199,075</b>	<b>202,322</b>	<b>646,279</b>
Portfolio Administration			94,186	140,728	197,583	262,995	695,492
Portfolio EM&V			94,186	134,296	188,529	232,695	649,706
<b>Total Portfolio Budget</b>			<b>1,360,317</b>	<b>4,705,728</b>	<b>6,577,538</b>	<b>8,123,268</b>	<b>20,766,851</b>

<b>Electric Savings Benefits Distribution (MWh)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			381	295	414	558	1,648
Existing Affordable Multifamily Buildings				815	1,093	1,571	3,479
Affordable New Construction							
Customer Awareness, Outreach & Engagement			7,604	1,040	985	739	10,369
<b>Total</b>			<b>7,985</b>	<b>2,150</b>	<b>2,492</b>	<b>2,868</b>	<b>15,495</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			2,924	1,551	1,642	2,255	8,372
Existing Affordable Multifamily Buildings				25,014	35,165	41,666	101,845
Affordable New Construction							
Customer Awareness, Outreach & Engagement							
<b>Total</b>			<b>2,924</b>	<b>26,565</b>	<b>36,807</b>	<b>43,921</b>	<b>110,217</b>

## C.9 Orange & Rockland

Forecasted budgets and benefits for O&R are directed towards the goal of fully investing the allocated budgets to support LMI customers. The Company expects the majority of LMI participation to be in the 1-4 Family Homes sector, so therefore 75% of the electric budget and 90% of the gas budget have been allocated towards the EmPower NY program. However, due to the high YTD run rate of the EmPower program, we are expecting some difficulty in achieving our overall LMI savings target. In addition, the Federal EISA regulations will have further impacts on reducing the energy savings potential per project starting in 2023. Therefore, the Company will look to expand its efforts on its lower cost Customer Awareness, Outreach, and Engagement programs in order to attempt to meet its overall LMI savings target. These Customer Awareness, Outreach and Engagement initiatives will engage and guide LMI customers to make energy-wise decisions for their homes.

Electric Budget Distribution (\$)							
	2020	2021	2022*	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			397,016	550,000	425,543	425,544	1,798,103
Program Implementation							
<b>Total Budget</b>			<b>397,016</b>	<b>550,000</b>	<b>425,543</b>	<b>425,544</b>	<b>1,798,103</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services				30,000	30,000	30,000	90,000
Program Implementation				8,000	8,000	8,000	24,000
<b>Total Budget</b>				<b>38,000</b>	<b>38,000</b>	<b>38,000</b>	<b>114,000</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services			58,630	60,000	60,000	60,000	238,630
Program Implementation			16,490	20,000	20,000	20,000	76,490
<b>Total Budget</b>			<b>75,119</b>	<b>80,000</b>	<b>80,000</b>	<b>80,000</b>	<b>315,119</b>
Portfolio Administration				39,436	20,000	20,000	79,436
Portfolio EM&V				5,000	5,000	5,000	15,000
<b>Total Portfolio Budget</b>			<b>472,136</b>	<b>712,436</b>	<b>568,543</b>	<b>568,544</b>	<b>2,321,659</b>

\* All 2022 expenditures, with the exception of Customer Awareness & Engagement, represent payments made by NYSERDA's EmPower and Energy Advisor Programs to benefit participating O&R electric customers during 2022. The pre-payments made by O&R to NYSERDA for running these two programs amounted to \$1,077,371 during 2022. Customer Awareness & Engagement expenditures during 2022 were specifically for O&R's Foodbank Program

Gas Budget Distribution (\$)							
	2020	2021	2022*	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services			966,012	816,470	703,761	811,040	3,297,283
Program Implementation							
<b>Total Budget</b>			<b>966,012</b>	<b>816,470</b>	<b>703,761</b>	<b>811,040</b>	<b>3,297,283</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services				60,000	60,000	60,000	180,000
Program Implementation				15,000	15,000	15,000	45,000
<b>Total Budget</b>				<b>75,000</b>	<b>75,000</b>	<b>75,000</b>	<b>225,000</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services				30,000	30,000	30,000	90,000
Program Implementation				10,000	10,000	10,000	30,000
<b>Total Budget</b>				<b>40,000</b>	<b>40,000</b>	<b>40,000</b>	<b>120,000</b>
Portfolio Administration				19,419	10,000	10,000	39,419
Portfolio EM&V				10,000	10,000	10,000	30,000
<b>Total Portfolio Budget</b>			<b>966,012</b>	<b>960,889</b>	<b>838,761</b>	<b>946,040</b>	<b>3,711,702</b>

\* All 2022 expenditures represent payments made by NYSERDA's EmPower and Energy Advisor Programs to benefit participating O&R gas customers during 2022. The pre-payments made by O&R to NYSERDA for running these two programs amounted to \$2,681,216 during 2022.

<b>Electric Savings Benefits Distribution (MWh)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			154	140	192	229	715
Existing Affordable Multifamily Buildings				53	55	55	163
Affordable New Construction							
Customer Awareness, Outreach & Engagement			1,649	500	500	500	3,149
<b>Total</b>			<b>1,803</b>	<b>693</b>	<b>747</b>	<b>784</b>	<b>4,027</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes			2,687	3,500	3,500	3,500	13,187
Existing Affordable Multifamily Buildings				6,500	6,500	6,675	19,675
Affordable New Construction							
Customer Awareness, Outreach & Engagement				500	500	500	1,500
<b>Total</b>			<b>2,687</b>	<b>10,500</b>	<b>10,500</b>	<b>10,675</b>	<b>34,362</b>

### C.10 Rochester Gas & Electric (RG&E)

Our planned expenditures align with the ordered targets. The planned savings do not align with the original ordered savings targets. This is due to misalignment of actual costs of the 1-4 family homes program compared to the targeted costs per savings in our orders (as explained in section 3 of this plan). It should be noted that the actual costs of 1-4 family program appears to be in alignment with national costs/industry standard. The variance is also due to the low response rates to the AMEEP program. To offset those (savings) shortfalls we plan to bolster our Customer Awareness, Outreach and Engagement. These supplemental programs will cross promote Empower and AMEEP while providing additional savings to low-income consumers. This will help achieve targeted electric savings but will not meet the targeted gas savings.

<b>Electric Budget Distribution (\$)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
<b>Existing 1-4 Family Homes</b>							
Incentives & Services	199,277	227,407	189,237	415,993	578,351	661,698	2,271,963
Program Implementation	27,270	25,639	40,453	5,257	7,309	7,707	113,634
Tools, Training, and Replication	1,559	1,499	(0)				3,058
<b>Total Budget</b>	<b>228,106</b>	<b>254,544</b>	<b>229,690</b>	<b>421,250</b>	<b>585,660</b>	<b>669,405</b>	<b>2,388,655</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services	256,456	73,013	100,359	202,880	372,138	403,634	1,408,480
Program Implementation	18,180	38,041	9,293	2,656	4,872	5,022	78,064
Tools, Training, and Replication	1,040	999	(0)				2,039
<b>Total Budget</b>	<b>275,676</b>	<b>112,053</b>	<b>109,652</b>	<b>205,536</b>	<b>377,010</b>	<b>408,656</b>	<b>1,488,583</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services			181,042	418,013	155,497	147,455	902,007
Program Implementation			57,430	5,776	2,149	2,037	67,392
Tools, Training, and Replication			38,431				38,431
<b>Total Budget</b>			<b>276,903</b>	<b>423,789</b>	<b>157,646</b>	<b>149,492</b>	<b>1,007,830</b>
Portfolio Administration		15,181	27,397	40,429	37,554	45,783	166,344
Portfolio EM&V			24,045	61,526	48,588	57,826	191,985
<b>Total Portfolio Budget</b>	<b>503,782</b>	<b>381,778</b>	<b>667,687</b>	<b>1,152,530</b>	<b>1,206,458</b>	<b>1,331,162</b>	<b>5,243,397</b>



Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
<b>Existing 1-4 Family Homes</b>							
Incentives & Services	19,183	370,104	538,548	981,849	1,367,341	1,705,703	4,982,728
Program Implementation	1,775	36,417	80,566	14,967	20,844	27,012	181,581
Tools, Training, and Replication	105	100					205
<b>Total Budget</b>	<b>21,062</b>	<b>406,621</b>	<b>619,114</b>	<b>996,816</b>	<b>1,388,185</b>	<b>1,732,715</b>	<b>5,164,513</b>
<b>Existing Affordable Multifamily Buildings</b>							
Incentives & Services	29,846	57,516	91,315	361,014	921,263	1,042,937	2,503,891
Program Implementation	1,183	41,789	23,562	5,422	13,836	76,765	162,558
Tools, Training, and Replication	70	67					137
<b>Total Budget</b>	<b>31,099</b>	<b>99,373</b>	<b>114,877</b>	<b>366,436</b>	<b>935,099</b>	<b>1,119,702</b>	<b>2,666,586</b>
<b>Affordable New Construction</b>							
Incentives & Services							
Program Implementation							
<b>Total Budget</b>							
<b>Customer Awareness, Outreach &amp; Engagement</b>							
Incentives & Services			36,269	277,699	344,730	332,466	991,164
Program Implementation			11,737	19,546	6,683	6,560	44,526
Tools, Training, and Replication							-
<b>Total Budget</b>			<b>48,005</b>	<b>297,245</b>	<b>351,413</b>	<b>339,026</b>	<b>1,035,689</b>
Portfolio Administration		19,121	62,150	20,338	25,147	49,659	176,415
Portfolio EM&V			20,714	40,370	60,284	89,086	210,454
<b>Total Portfolio Budget</b>	<b>52,161</b>	<b>525,114</b>	<b>864,860</b>	<b>1,721,205</b>	<b>2,760,128</b>	<b>3,330,188</b>	<b>9,253,656</b>

<b>Electric Savings Benefits Distribution (MWh)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes	280	236	176	389	575	641	2,298
Existing Affordable Multifamily Buildings	509	46	428	388	384	427	2,182
Affordable New Construction Customer Awareness, Outreach & Engagement			3,345	1,507	400	400	5,652
<b>Total</b>	<b>789</b>	<b>282</b>	<b>3,949</b>	<b>2,284</b>	<b>1,359</b>	<b>1,468</b>	<b>10,131</b>

<b>Gas Savings Benefits Distribution (MMBtu)</b>							
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>Total</b>
Existing 1-4 Family Homes	216	1,564	1,986	4,368	4,737	5,238	18,108
Existing Affordable Multifamily Buildings	787		3,050	3,476	8,875	11,501	27,689
Affordable New Construction Customer Awareness, Outreach & Engagement			789	2,897	2,084	2,084	7,854
<b>Total</b>	<b>1,003</b>	<b>1,564</b>	<b>5,825</b>	<b>10,741</b>	<b>15,696</b>	<b>18,823</b>	<b>53,651</b>

## Appendix D: Budgets, Benefits, and Metrics by Sector

### D.1 Existing 1-4 Family Homes

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	53,970	73,892	98,547	42,115	26,537	28,104						280,984
Additional Utility Funding <sup>125</sup> (\$000)												42,181
MWh Annual	2,878	4,760	5,395	2,729	2,376	2,927						21,066
MWh Lifetime	44,319	72,059	81,915	43,174	38,258	47,599						327,325
MMBtu Annual	184,660	262,108	273,068	138,617	115,507	119,351						1,093,310
MMBtu Lifetime	4,527,853	6,438,864	6,528,900	3,127,224	2,495,390	2,541,300						25,659,531
Participants	13,064	18,182	17,421	9,278	8,212	8,865						75,022
Leveraged Funds (\$000)	14,100	29,408	16,200	6,811	2,609							69,128

<sup>125</sup> Additional Utility Funding in Appendix C tables contributed by KEDLI and NFGDC from rate case allocated funds, and by Central Hudson and NYSEG/RG&E from market rate program funds.

## D.2 Existing Affordable Multifamily Buildings

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	17,732	24,819	34,993	60,737	96,444	101,004	30,196	23,778	600			389,723
Additional Utility Funding (\$000)												580
Direct MWh Annual	8,487	15,428	15,558	14,522	22,692	32,925	15,537	11,587				136,736
Direct MWh Lifetime	105,348	212,171	199,853	181,706	299,973	456,276	236,712	174,580				1,866,618
Indirect MWh Annual <sup>126</sup>			982	3,842	4,020	5,849	12,051	14,971	19,205	25,498	31,826	118,244
Indirect MWh Lifetime			14,997	48,674	51,344	84,592	189,720	252,760	342,093	468,880	595,088	2,048,148
Direct MMBtu Annual	100,640	266,084	409,032	610,337	820,657	1,256,495	647,224	533,740				4,644,209
Direct MMBtu Lifetime	1,366,650	3,522,739	5,545,432	8,048,042	11,840,920	18,627,529	9,773,955	8,020,008				66,745,274
Indirect MMBtu Annual			48,317	161,919	205,100	296,111	402,693	423,343	467,568	574,022	676,284	3,255,356
Indirect MMBtu Lifetime			724,751	1,983,080	2,630,808	4,091,548	6,088,625	6,743,223	7,869,312	10,046,692	12,133,847	52,311,885
Participants	3,808	9,844	98,273	106,311	124,023	100,371	10,350	560				453,539
Leveraged Funds (\$000)	19,196	33,738	25,808	282,468	385,288	393,393	380,637	150,568				1,671,096

<sup>126</sup> NYSERDA indirect savings are discounted by 50% and reported as plans throughout this Implementation Plan.

### D.3 Affordable New Construction

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	5,034	6,617	11,395	6,570	18,001	25,738	31,270	23,080	17,615			145,319
Direct MWh Annual	2,346	3,717	2,960	3,000	11,079	16,090	14,850	14,332	14,475	3,857	1,929	88,634
Direct MWh Lifetime	50,069	88,147	65,250	66,250	259,725	382,250	371,250	358,300	361,875	96,425	48,225	2,147,766
Indirect MWh Annual <sup>127</sup>	3,487	1,297	1,553	1,553	1,553	1,553	1,553	1,553	1,553	1,553	1,553	18,757
Indirect MWh Lifetime	87,175	32,425	38,813	38,813	38,813	38,813	38,813	38,813	38,813	38,813	38,813	468,913
Direct MMBtu Annual	41,462	36,222	29,000	32,150	89,151	119,851	102,850	88,428	76,000	21,428	10,715	647,257
Direct MMBtu Lifetime	965,512	860,283	643,000	706,750	2,076,275	2,836,275	2,571,250	2,210,700	1,900,000	535,700	267,875	15,573,620
Indirect MMBtu Annual	25,373	7,575	8,750	8,750	8,750	8,750	8,750	8,750	8,750	8,750	8,750	111,694
Indirect MMBtu Lifetime	634,325	189,375	218,738	218,738	218,738	218,738	218,738	218,738	218,738	218,738	218,738	2,792,338
Participants	1,922	3,068	1,860	2,075	5,770	6,655	6,685	6,637	5,175	1,429	714	41,990
Leveraged Funds (\$000)	7,388	11,869	8,040	10,150	27,925	42,855	36,860	24,857	10,929			180,873

### D.4 Customer Awareness, Outreach, and Engagement

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	3,225	1,029	9,009	16,084	15,316	15,132	10,126					69,921
MWh Annual	34,594	9,317	30,570	11,948	9,724	8,545						104,698
MWh Lifetime	297,509	80,123	394,295	141,912	108,546	92,124						1,114,509
MMBtu Annual	32,374	370	5,901	18,490	11,501	10,935						79,570
MMBtu Lifetime	323,738	3,701	12,096	24,713	22,553	13,823						400,624
Participants	501,558	66,682	262,238	198,048	227,023	208,881						1,464,430
Leveraged Funds (\$000)	2,028	1,028										3,056

<sup>127</sup> NYSERDA indirect savings are discounted by 50%

## D.5 Pilots and Demonstrations

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	230	Total
Total Budget Spend (\$000)			213	639	398	398	398	398				2,444
MWh Annual												
MWh Lifetime												
MMBtu Annual												
MMBtu Lifetime												
Participants												
Leveraged Funds (\$000)												

### D. 6 NYS Healthy Homes VBP

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	921	285	624	3,813	3,591	591						9,825
MWh Annual		0	15	150	135							300
MWh Lifetime		6	210	2,100	1,890							4,206
Indirect MWh Annual <sup>128</sup>	96							2,429			25,475	28,000
Indirect MWh Lifetime	1,344							34,006			356,650	392,000
MMBtu Annual	-		500	5,000	4,500							10,000
MMBtu Lifetime	-		10,000	100,000	90,000							200,000
Indirect MMBtu Annual	3,200							80,800			851,000	935,000
Indirect MMBtu Lifetime	64,000							1,616,000			17,020,000	18,700,000
Participants Leveraged Funds (\$000)		1	25	250	225							501

<sup>128</sup> NYSERDA indirect savings are discounted by 50%

### D.7 Beneficial Electrification<sup>129</sup>

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	13	3,845	2,280	4,580	5,637	8,233	5,412					30,000
MWh Annual												
MWh Lifetime												
MMBtu Annual												
MMBtu Lifetime												
Participants												
Leveraged Funds (\$000)												

### D.8 LMI Solar<sup>130</sup>

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	1,283	895	1,300	1,300	1,248	1,200	1,187	1,100	1,100	1,100		11,713
MWh Annual												
MWh Lifetime												
MMBtu Annual												
MMBtu Lifetime												
Participants												
Leveraged Funds												

<sup>129</sup> At the time of this filing, the Beneficial Electrification activities are currently being planned. Projected savings, participants, leveraged funds, and participant bill savings will be incorporated in an updated future filing of the Implementation Plan.

<sup>130</sup> The total budget for Solar for All is \$21,245,000. However, \$8,723,237 is uncommitted in the CEF LMI Chapter and is being carried forward into the Statewide LMI Portfolio Implementation Plan. Metrics for LMI Solar are included and reported through NY-Sun.



## Appendix E: Statewide LMI Portfolio Performance Metrics Tracking Mechanisms

The below table indicates how the Performance Metrics in [Section 2.5](#) will be assessed.

Performance Metrics Tracking Mechanism	Relevant Performance Metrics
Utilize quarterly portfolio performance metrics to assess performance	<ul style="list-style-type: none"> <li>• MWh annual/lifetime savings achievements</li> <li>• MMBtu annual/lifetime savings achievements</li> <li>• CO2e Emission Reduction (metric tons) annual/lifetime achievements</li> <li>• Number of participants served</li> <li>• Participant bill savings annual/lifetime achievements</li> <li>• Budget spent</li> </ul>
Collaboration on data collection tools and practices with potential for additional portfolio-level market research	<ul style="list-style-type: none"> <li>• Percentage of participants that learn about portfolio initiatives from various sources (<i>e.g.</i>, Customer Hub, Utility or NYSERDA outreach materials, contractors, <i>etc.</i>)</li> <li>• Participation satisfaction rating</li> </ul>
Analyze administrative costs through Statewide LMI Portfolio BCA	<ul style="list-style-type: none"> <li>• Administrative cost associated with statewide approach</li> </ul>
Track savings acquired that were related to a comprehensive project	<ul style="list-style-type: none"> <li>• Energy savings acquired from comprehensive projects</li> </ul>

## Appendix F: Preliminary BCA Results by Program Administrator

The table below lists the benefits and costs considered in calculating benefit/cost ratios for the Statewide LMI Portfolio.<sup>131</sup>

Type	Component
Costs	Measure equipment and installation (labor) costs
	Program administrator costs (program administration, including marketing, implementation contractor, and EM&V)
Benefits	Avoided energy costs
	Deferred capacity costs (generation, transmission, and distribution)
	Reduced CO <sub>2</sub> emissions

The following tables report preliminary BCA results by Program Administrator.

### F.1 Central Hudson

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
<b>2022</b>	\$1,100,170	\$801,487	1.37	\$563,799	\$709,516	0.79
<b>2023</b>	\$1,306,671	\$821,157	1.59	\$678,392	\$758,044	0.89
<b>2024</b>	\$1,586,361	\$1,115,729	1.42	\$825,812	\$901,454	0.92
<b>2025</b>	\$2,271,100	\$1,744,310	1.30	\$1,186,417	\$1,275,993	0.93

<sup>131</sup> While the Program Administrators provided an updated BCA in 2022 (*i.e.*, NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio Implementation Plan, Version 2 (filed April 29, 2022)), a new BCA was not conducted for the Nov. 1, 2022 filing or May 1, 2023. A new BCA will be conducted in conjunction with the next annual Implementation Plan to be filed, scheduled for filing in the fall of 2023.

## F.2 Con Edison

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$51,080,543	\$51,133,391	1.00	\$25,724,450	\$33,765,575	0.76
2023	\$53,268,295	\$63,748,630	0.84	\$27,293,375	\$42,927,176	0.64
2024	\$62,389,118	\$76,246,720	0.82	\$32,981,194	\$51,718,109	0.64
2025	\$18,585,128	\$20,456,887	0.91	\$9,716,518	\$14,606,893	0.67

## F.3 National Grid (KEDLI)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$2,967,462	\$3,671,284	0.81	\$1,413,084	\$3,461,042	0.41
2023	\$3,457,351	\$4,510,816	0.77	\$1,654,740	\$4,258,399	0.39
2024	\$4,259,962	\$5,353,215	0.80	\$2,030,332	\$5,081,170	0.40
2025	\$5,219,937	\$6,061,711	0.86	\$2,516,949	\$5,683,069	0.44

## F.4 National Grid (KEDNY)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$5,190,045	\$4,609,228	1.13	\$2,461,883	\$4,074,140	0.60
2023	\$7,154,423	\$5,949,257	1.20	\$3,419,462	\$5,245,694	0.65
2024	\$8,738,207	\$7,075,575	1.23	\$4,206,620	\$6,209,344	0.68
2025	\$11,741,031	\$9,495,279	1.24	\$5,695,205	\$8,320,164	0.68

## F.5 National Fuel Gas

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$13,786,505	\$13,264,762	1.04	\$7,170,221	\$12,813,246	0.56
2023	\$8,777,934	\$8,919,949	0.98	\$4,515,327	\$8,388,351	0.54
2024	\$8,853,170	\$8,875,968	1.00	\$4,574,321	\$8,235,878	0.56
2025	\$9,053,885	\$9,016,712	1.00	\$4,700,476	\$8,326,578	0.56

## F.6 New York State Energy Research & Development Authority

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$123,062,056	\$171,892,755	0.72	\$66,513,484	\$85,127,359	0.78
2023	\$202,073,274	\$158,557,184	1.27	\$113,991,098	\$73,594,632	1.55
2024	\$223,283,211	\$159,971,111	1.40	\$127,722,744	\$68,918,472	1.85
2025	\$303,399,470	\$214,246,523	1.42	\$174,550,033	\$72,816,016	2.40
2026	\$155,304,952	\$137,101,783	1.13	\$89,752,333	\$48,146,083	1.86
2027	\$45,406,627	\$98,047,352	0.46	\$25,954,905	\$17,777,508	1.46
2028	\$13,661,876	\$9,450,895	1.45	\$7,927,563	\$6,613,693	1.20
2029	\$4,930,952	\$2,515,370	1.96	\$2,882,858	\$2,515,370	1.15

## F.7 New York State Electric & Gas (NYSEG)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$2,929,427	\$3,790,650	0.77	\$1,147,129	\$3,624,001	0.32
2023	\$5,346,983	\$6,852,238	0.78	\$2,164,809	\$6,329,408	0.34
2024	\$7,759,571	\$10,989,299	0.71	\$3,214,530	\$10,002,023	0.32
2025	\$11,565,913	\$16,290,098	0.71	\$4,935,957	\$14,604,530	0.34

## F.8 National Grid (NMPC)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$9,350,025	\$4,747,160	1.97	\$4,092,232	\$4,507,331	0.91
2023	\$9,684,813	\$6,698,929	1.45	\$4,546,634	\$6,309,273	0.72
2024	\$11,312,959	\$8,581,369	1.32	\$5,459,277	\$8,099,339	0.67
2025	\$16,620,138	\$11,917,709	1.39	\$8,273,160	\$11,181,779	0.74

### F.9 Orange & Rockland

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$4,073,400	\$2,280,267	1.79	\$1,652,659	\$2,222,822	0.74
2023	\$2,423,222	\$2,155,234	1.12	\$1,092,525	\$2,072,147	0.53
2024	\$2,773,362	\$2,474,243	1.12	\$1,265,312	\$2,369,635	0.53
2025	\$2,967,579	\$2,616,112	1.13	\$1,367,891	\$2,493,688	0.55

### F.10 Rochester Gas & Electric (RG&E)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2022	\$1,490,165	\$2,088,591	0.71	\$572,344	\$1,991,277	0.29
2023	\$2,402,498	\$3,307,788	0.73	\$948,567	\$3,084,559	0.31
2024	\$3,657,119	\$4,979,804	0.73	\$1,469,738	\$4,622,560	0.32
2025	\$5,564,652	\$7,470,173	0.74	\$2,269,141	\$6,837,399	0.33

## Appendix G: Implementation Milestones

This Appendix provides additional detail regarding the milestones provided in the 2020 Plan and this Plan. The tables below have two milestone columns to indicate whether a milestone is from the 2020 Plan or is new or updated in this Plan. The third column provides the Status as of the filing of this Plan. Additional information on the progress of meeting milestones to date is provided in Annual Reports. For example, the 2021 Annual Report provides additional detail on progress made in 2021 towards the milestones from 2020 and 2021 as laid out in the 2020 Implementation Plan.<sup>132</sup> Any milestone with the status “Delayed” or “No Longer Applicable” has its status explained in more detail below its respective milestone table.

### G.1 1-4 Family Homes

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan <sup>133</sup>	Status
2020	<ul style="list-style-type: none"> <li>Redesign of current set of initiatives to better align utility and NYSEDA offers, improve customer experience by reducing administrative burden, and developing a more graduated scale of financial support</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Stakeholder engagement to inform redesign of programs</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Test a model geographic-based eligibility and determine how it can be applied to programs going forward</li> </ul>		Complete
2021	<ul style="list-style-type: none"> <li>Launch of redesigned programs (<i>milestone moved from 2021 to 2023</i>)</li> </ul>		Delayed

<sup>132</sup> NE: NY Proceeding, 2021 Annual Report.

<sup>133</sup> Most milestones included in the “Milestone Added or Updated in a 2022 revision to the Implementation Plan” column throughout Appendix F were updated or added in the April 29, 2022, Implementation Plan filing. Some were added or further updated in the November 1, 2022, filing. Where a milestone was added or further updated in the November 1 filing, it is indicated by an explanatory footnote.

	<ul style="list-style-type: none"> <li>Ongoing stakeholder engagement and coordination with other programs (e.g., HEAP and WAP)</li> </ul>		In Progress
2022	<ul style="list-style-type: none"> <li>Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities</li> </ul>		No Longer Applicable
	<ul style="list-style-type: none"> <li>Ongoing stakeholder engagement and coordination with other programs (e.g., HEAP and WAP)</li> </ul>	<ul style="list-style-type: none"> <li>Improve coordination with other programs (e.g., HEAP and WAP)</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Enhance effectiveness of the EmPower referral process and improve customer conversion rate by conforming to consistent data file submission to NYSERDA</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Identify ways to enhance or add measures to the existing EmPower offerings, particularly for gas savings</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Contract for new program workflow software and implementation support services</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Increase awareness, community outreach and education through coordination with the new Clean Energy Hubs and existing utility outreach programs.</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Work with NYS Clean Heat JMC to streamline customer access to both</li> </ul>	

		NYS Clean Heat and EmPower with appropriate affordability protections	
		<ul style="list-style-type: none"> <li>Outline and seek input on a plan to phase out support for fossil fuel fired equipped in GJGNY audits, financing, and LMI programs to align with Climate Act while preserving energy affordability.</li> </ul>	Planning
2023	<ul style="list-style-type: none"> <li>Launch of redesigned programs (<i>milestone moved to 2023 from 2021</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Launch the combined, streamlined LMI program: EmPower+</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Increase DAC access to EmPower+ by incorporating DAC geographic eligibility and coordinating with regional Clean Energy Hubs on targeted outreach to DACs</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>Integrate EmPower+ and NYS Clean Heat offerings to increase access to incentives for electrification</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>Pursue opportunities to obtain and incorporate funding from the Inflation Reduction Act into LMI programs<sup>134</sup></li> </ul>	Planning
2024		<ul style="list-style-type: none"> <li>Evaluate program performance and optimize design to serve more homes and encourage more contractors to offer efficiency and electrification services through the program</li> </ul>	Planning

<sup>134</sup> Milestone added in the November 1, 2022, Implementation Plan filing.



		<ul style="list-style-type: none"> <li>Launch Customer portal for increased customer engagement and project monitoring</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>Increase contractor base and expand offerings to meet increased climate goals</li> </ul>	Planning

***Milestones marked as “Delayed” or “No Longer Applicable”***

The “Launch of redesigned programs” milestone originally included for 2021 in the 2020 Implementation Plan is marked as “Delayed” in this Implementation Plan due to unforeseen unavailability of program management software and the need to procure new program workflow software and implementation support services to operate EmPower+. It is anticipated that new software and implementation support will be acquired and operational by 2023. Therefore, a new milestone for the “Launch of the combined, streamlined LMI program: EmPower+” has been added for 2023.

The “Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities” milestone originally included for 2022 in the 2020 Implementation Plan is marked as “No Longer Applicable” because it has been replaced with more specific and actionable milestones, such as the “Increase DAC access to EmPower+ by incorporating geographic eligibility and coordinating with regional Clean Energy Hubs on targeted outreach to DACs” milestone and the “Work with NYS Clean Heat JMC to streamline customer access to both NYS Clean Heat and EmPower with appropriate affordability protections” milestone.

**G.2 Statewide Existing Affordable Multifamily Program**

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
2020	<ul style="list-style-type: none"> <li>Determine implementation structure and coordination among Program Administrators</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Develop a consistent framework for an incentive program that promotes comprehensive upgrades but allows</li> </ul>		Complete

	flexibility for prescriptive upgrades		
	<ul style="list-style-type: none"> <li>Develop process to coordinate technical assistance with incentive-based program</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Work with housing agencies to develop an approach to directly incorporate program incentives into the capital stack for affordable multifamily buildings that are being refinanced</li> </ul>		Complete
2021	<ul style="list-style-type: none"> <li>Launch consistent statewide framework for incentive-based program</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Identify additional areas to streamline administration of program (<i>milestone moved from 2021 to 2022</i>)</li> </ul>		Delayed
	<ul style="list-style-type: none"> <li>Launch approach to working with housing agencies</li> </ul>		Complete
2022	<ul style="list-style-type: none"> <li>Identify additional areas to streamline administration of program (<i>milestone moved to 2022 from 2021</i>)</li> </ul>		In Progress
	<ul style="list-style-type: none"> <li>Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities (<i>milestone moved from 2022 to 2023</i>)</li> </ul>		Delayed

	<ul style="list-style-type: none"> <li>Ongoing stakeholder engagement and coordination with other programs (e.g., NYS HCR, NYC HPD and housing agencies)</li> </ul>	<ul style="list-style-type: none"> <li>Expand direct funding partnership between NYSERDA and NYS HCR to serve affordable housing new construction and preservation</li> </ul>	Complete
		<ul style="list-style-type: none"> <li>Develop Program Administrator processes for statewide operations of AMEEP (e.g., document updates) and launch webinar series to engage Participating Contractors and Industry Partners by Q2</li> </ul>	Complete <sup>135</sup>
		<ul style="list-style-type: none"> <li>Coordinate AMEEP incentives with NYS Clean Heat and align release to market with NYS Clean Heat announcement cycles for program changes</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>NYSERDA to support housing agencies in development of sustainability/design guidelines for efficient, all-electric new construction and retrofit projects</li> </ul>	Complete
		<ul style="list-style-type: none"> <li>Issue Clean Heat for All packaged window heat pump RFP through partnership between NYSERDA, NYPA, and NYCHA</li> </ul>	Complete

<sup>135</sup> Status updated from “In Progress” in the April 29, 2022, Implementation Plan filing to “Complete” in the November 1, 2022, Implementation Plan filing.

		<ul style="list-style-type: none"> <li>Along with NYCHA and NYPA, select winning manufacturer(s) that responded to Clean Heat for All packaged window heat pump challenge RFP</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Provide technical assistance and staffing resources to assist with capacity-building at HCR and HPD</li> </ul>	In Progress
2023	<ul style="list-style-type: none"> <li>Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities (<i>milestone moved from 2022 to 2023</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Organize stakeholder interviews on AMEEP design and operations based on the first full year of operation to get feedback to guide analysis and potential program changes, and adapt program eligibility to reflect final DAC criteria</li> </ul>	Future
		<ul style="list-style-type: none"> <li>Review program objectives and operations to enable alignment with potential policy changes scheduled to take place in 2022 and 2023 (<i>e.g., NE: NY mid-point review, Climate Act definition of providing benefits to DACs</i>)</li> </ul>	Future
		<ul style="list-style-type: none"> <li>Issue initial small purchase order for and install initial packaged window heat pumps in NYCHA properties as part of 'demonstration</li> </ul>	Future

		phase' of Clean Heat for All initiative	
2024		<ul style="list-style-type: none"> <li>Study creation of measure packages for comprehensive retrofits by building typology based on data from AMEEP participants, and assess ability to offer packages as part of AMEEP</li> </ul>	Future
		<ul style="list-style-type: none"> <li>Assess viability of packaged window heat pumps as an effective electrification approach/model for NYCHA housing and broader NY multifamily market</li> </ul>	Future
		<ul style="list-style-type: none"> <li>Pending success of demonstration phase, initiate broader implementation phase of Clean Heat for All initiative and install additional packaged window heat pumps</li> </ul>	Future

***Milestones marked as “Delayed”***

The “Identify additional areas to streamline administration of program” milestone originally included for 2021 in the 2020 Implementation Plan was moved to 2022 and marked as “In Progress” in this Implementation Plan because the Program Administrators began work on streamlining administration of the program in 2021, such as using only two Implementation Contractors statewide for AMEEP. The Program Administrators believe that this is an ongoing milestone that merits additional analysis following the launch of AMEEP in late 2021.

The “Ongoing stakeholder engagement and coordination with other programs (*e.g.*, NYS HCR, NYC HPD and housing agencies)” milestone has been replaced with more specific and actionable milestones, such as the “Expand direct funding partnership between NYSERDA and NYS HCR to serve affordable housing new construction and preservation”

milestone, and the “Launch webinar series to engage Participating Contractors and Industry Partners by Q2” milestone.

Similarly, the “Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities” milestone originally included for 2022 in the 2020 Implementation Plan was moved to 2023, and the language was refined to read “Organize stakeholder interviews on AMEEP design and operations based on the first full year of operation to get feedback to guide analysis and potential program changes.” While the original milestone will indeed be an ongoing effort throughout 2022, the Program Administrators reframed the milestone to be more actionable.

### G.3 Technical Assistance for Affordable Multifamily Buildings

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
2020	<ul style="list-style-type: none"> <li>Develop process to coordinate technical assistance with incentive-based program</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Work with housing agencies and financiers to identify gaps in available performance data and invest in the development of data sets that can be used to aid in determinations on underwriting and build confidence among financiers and housing agencies</li> </ul>		In Progress
2021	<ul style="list-style-type: none"> <li>Launch technical assistance in a coordinated approach with the incentive-based program</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Identify additional opportunities to work with housing agencies and financiers to develop</li> </ul>		In Progress

	initiatives to aid in project development		
		<ul style="list-style-type: none"> <li>Identify technical assistance provider to service NYSERDA/ NYC HPD electrification pilot<sup>136</sup></li> </ul>	Complete
		<ul style="list-style-type: none"> <li>Identify projects for the NYSERDA/ NYC HPD electrification pilot</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>NYSERDA will offer FlexTech services for AMEEP projects that pay SBC on gas but not electric</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>NYSERDA will assess how technical assistance feeds into and informs the development and completion of the 2M climate friendly homes by 2030 action plan</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Clean Heating and Cooling Analysis of FlexTech studies that will help inform future program development and is intended to increase the rate at which clean energy technologies are identified through studies or best practices</li> </ul>	In Progress
2022	<ul style="list-style-type: none"> <li>Calibration of programs, where necessary, to improve impact and reach</li> </ul>	<ul style="list-style-type: none"> <li>Update program eligibility to increase</li> </ul>	Planning

<sup>136</sup> Additional historical milestones for 2021 (*i.e.*, as compared to the 2020 Plan) are provided here to reflect additional detail for Technical Assistance for Affordable Multifamily Buildings.

	underserved or otherwise disadvantaged communities.	access in disadvantaged communities	
	<ul style="list-style-type: none"> <li>Ongoing stakeholder engagement and coordination with other programs (e.g., NYS HCR, NYC HPD and housing agencies)</li> </ul>	<ul style="list-style-type: none"> <li>Engage with NYS HCR colleagues, affordable housing owners, and developers to refine integration of technical assistance within housing financing application processes</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Encourage energy service providers to include electrification and/or electrification readiness as part of any subsidized technical assistance scopes to support long-term decarbonization efforts</li> </ul>	In Progress
2023		<ul style="list-style-type: none"> <li>Provide technical assistance resources to housing agencies to build in-house capacity to assess and support sustainability as part of core mission</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Require consideration of electrification and/or electrification readiness as part of any subsidized technical assistance to enable long-term building decarbonization efforts</li> </ul>	Planning

#### G.4 RetrofitNY

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
	<ul style="list-style-type: none"> <li>One or more solutions are built and tested through</li> </ul>		In Progress



2021	the design-build competition process		
	<ul style="list-style-type: none"> <li>• Solution(s) are adapted to additional building typologies</li> </ul>		In Progress
2022	<ul style="list-style-type: none"> <li>• Integration of retrofit solutions in the public housing authorities' and affordable housing regulators' preservation strategies (<i>milestone moved from 2022 to 2023 and 2024</i>)</li> </ul>		Delayed
2023	<ul style="list-style-type: none"> <li>• Integration of retrofit solutions in the public housing authorities' and affordable housing regulators' preservation strategies (<i>milestone moved to 2023 from 2022</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Integration of retrofit solutions in the public housing authorities' strategies (<i>milestone moved to 2023 from 2022</i>)</li> </ul>	In Progress
2024	<ul style="list-style-type: none"> <li>• Integration of retrofit solutions in the public housing authorities' and affordable housing regulators' preservation strategies (<i>milestone moved to 2024 from 2022</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Integration of retrofit solutions into regulated affordable housing preservation strategies (<i>milestone moved to 2024 from 2022</i>)</li> </ul>	Future
2025	<ul style="list-style-type: none"> <li>• Retrofit solutions are cost effective and NYSERDA subsidies are no longer necessary.</li> </ul>	<ul style="list-style-type: none"> <li>• Deliver retrofit solutions that are cost effective such that NYSERDA subsidies are no longer necessary</li> </ul>	Future
	<ul style="list-style-type: none"> <li>• Building components and systems required for deep energy retrofits are readily available in the New York market.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop a market for building components and systems required for deep energy retrofits so that they are readily available in New York</li> </ul>	Future
	<ul style="list-style-type: none"> <li>• Financing solutions exists for building owners to</li> </ul>	<ul style="list-style-type: none"> <li>• Support creation of financing solutions to</li> </ul>	Future

	purchase these solutions with minimal upfront cost.	enable building owners to take advantage of these solutions at scale	
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***Milestones marked as “Delayed”***

The “Integration of retrofit solutions in the public housing authorities’ and affordable housing regulators’ preservation strategies” milestone was delayed from 2022 to 2023 and 2024 because of impacts related to COVID-19. Due to stalled pipelines, demonstration projects were substantially delayed in financial closings with the housing agencies and could not enter construction.

**G.5 Affordable New Construction**

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
2020	<ul style="list-style-type: none"> <li>Existing programs will continue</li> </ul>		Completed
	<ul style="list-style-type: none"> <li>Design of coordinated offerings between NYSERDA and utilities</li> </ul>		No Longer Applicable
2021	<ul style="list-style-type: none"> <li>Launch of coordinated program offerings</li> </ul>		No Longer Applicable
	<ul style="list-style-type: none"> <li>Launch of high-performance demonstrations and competitions</li> </ul>		Complete
2022	<ul style="list-style-type: none"> <li>Launch of high-performance demonstrations and competitions</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Incorporation of lessons learned from previous demonstrations and competitions</li> </ul>		Complete

		<ul style="list-style-type: none"> <li>• Launch of Round 3 of the Buildings of Excellence Multifamily Design Competition</li> </ul>	Complete <sup>137</sup>
		<ul style="list-style-type: none"> <li>• Expand integrated funding with State and local affordable housing agencies</li> </ul>	In Progress
2023		<ul style="list-style-type: none"> <li>• Continue expanding integration with public housing agencies</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>• Utilize data and successful sets from decarbonization projects to deploy information through Channel Partners, conferences, and other general awareness activities</li> </ul>	In Progress
2024		<ul style="list-style-type: none"> <li>• Continue expanding integration with public housing agencies</li> </ul>	Future
		<ul style="list-style-type: none"> <li>• Utilize data and successful sets from decarbonization projects to deploy information through Channel Partners, conferences, and other general awareness activities</li> </ul>	Future
2025		<ul style="list-style-type: none"> <li>• Continue expanding integration with public housing agencies</li> </ul>	Future
		<ul style="list-style-type: none"> <li>• Utilize data and successful sets from</li> </ul>	Future

<sup>137</sup> Status updated from “In Progress” in the April 29, 2022, Implementation Plan filing to “Complete” in the November 1, 2022, Implementation Plan filing.

		decarbonization projects to deploy information through Channel Partners, conferences, and other general awareness activities	
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***Milestones marked as “No Longer Applicable”***

The “Design of coordinated offerings between NYSERDA and utilities” milestone originally included for 2021 in the 2020 Implementation Plan is no longer applicable as the milestones have evolved with the New Construction portfolio. NYSERDA will continue to coordinate with Utilities throughout all sectors of the LMI portfolio.

**G.6 Beneficial Electrification in LMI Homes**

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
2020	<ul style="list-style-type: none"> <li>Research and analysis on institutional barriers, consumer protections, and application of heat pump solutions to ensure greater impact for LMI customers, tenants, and affordable multifamily building owners</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Design of short-term incentives</li> </ul>	<ul style="list-style-type: none"> <li>Design and launch short-term incentives to offset costs of heat pump installations in LMI homes and affordable multifamily buildings to advance heat</li> </ul>	Complete

		pump deployment in LMI housing and support future market learnings <sup>138</sup>	
2021	<ul style="list-style-type: none"> <li>Continued research and analysis</li> </ul>		No Longer Applicable
	<ul style="list-style-type: none"> <li>Launch of short-term incentives to offset costs of heat pump installations in LMI homes or affordable multifamily buildings</li> </ul>		Complete
	<ul style="list-style-type: none"> <li>Launch pilots and demonstrations</li> </ul>		Delayed
	<ul style="list-style-type: none"> <li>Assess lessons learned from research, analysis, pilots, and incentive offerings</li> </ul>		In Progress
2022	<ul style="list-style-type: none"> <li>Continued pilots and demonstrations</li> </ul>		No Longer Applicable
	<ul style="list-style-type: none"> <li>Continued incentive offerings</li> </ul>		No Longer Applicable
	<ul style="list-style-type: none"> <li>Planning for long-term investment in electrification for the LMI market segment, based on research and analysis and learnings from the pilots, demonstrations, and incentive offerings</li> </ul>		No Longer Applicable
		<ul style="list-style-type: none"> <li>Launch evaluation and market insights study based on projects completed through short-term</li> </ul>	In Progress

<sup>138</sup> This historical milestone for 2020 is updated (*i.e.*, as compared to the 2020 Plan) to provide additional detail regarding short-term incentives.

		incentive offering incentive offerings	
		<ul style="list-style-type: none"> <li>Publish LMI chapter within Building Electrification Roadmap, outlining key policy approaches to scale LMI electrification through 2030</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Partner with sister agencies to aggressively shift existing benefit programs into alignment with the State’s housing decarbonization targets, especially LIHEAP, WAP, and the State’s Energy Affordability Policy and Utility Energy Assistance Programs</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Conduct research and analysis on electrification of affordable housing, develop recommendations for protecting tenants from heating cost shifts<sup>139</sup></li> </ul>	In Progress <sup>140</sup>
		<ul style="list-style-type: none"> <li>Continue programmatic support for LMI heat pump installations, with a focus on segments that present the least technical difficulty and/or the most</li> </ul>	Planning

<sup>139</sup> Milestone updated from “Conduct research and analysis leading to the development of an Affordability and Consumer Protections framework for LMI Electrification, outlined in the Two Million Climate-Friendly Homes Action Plan” in the April 29, 2022, Implementation Plan filing to current language.

<sup>140</sup> Status updated from “Planning” in the April 29, 2022, Implementation Plan filing to “In Progress” in the November 1, 2022, Implementation Plan filing.

		<p>favorable return on investment, including buildings using delivered fuels and electric resistance heat, buildings with inefficient gas furnaces or boilers, and multifamily buildings with steam distribution systems</p>	
		<ul style="list-style-type: none"> <li>• Design and launch a program offering supporting rapid response heat pump conversions in situations where existing fossil heating systems are at or near failure</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>• Launch additional program support for LMI multifamily building owners seeking to integrate electrification into their portfolio by providing wraparound services for guidance on capital planning, identifying best-fit technology solutions, employee training, project scoping, how to overcome hurdles related to existing subsidy agreements and tenant leases, and identifying incentives and other financial support for installing heat pumps</li> </ul>	Planning

		<ul style="list-style-type: none"> <li>Design pilot(s) supporting DHW electrification conversions for multifamily buildings</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>Launch research focused on policy and regulatory initiatives that can further enable heat pump adoption in LMI housing</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>Conduct Stakeholder engagement to develop promising approaches for community- and place-based interventions supporting heat pump deployment in LMI and Disadvantaged Communities</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>Develop and launch additional educational materials for LMI customers and building owners, including short how-to videos and other multimedia offerings</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>In collaboration with DPS and the utilities, identify the scope of and pathway to increased support for pre-electrification make-ready work such as electrical panel upgrades</li> </ul>	Planning
2023		<ul style="list-style-type: none"> <li>Publish interim learnings from the single-family LMI</li> </ul>	Future



		heat pump demonstration study (short term incentives)	
		<ul style="list-style-type: none"> <li>Publish interim learnings from the multifamily LMI heat pump demonstrations study (short term incentives)</li> </ul>	Future
		<ul style="list-style-type: none"> <li>Revise program rules to incorporate learnings from affordability and consumer protections research</li> </ul>	Future
2024		<ul style="list-style-type: none"> <li>Publish interim learnings from pilots and demonstrations</li> </ul>	Future
		<ul style="list-style-type: none"> <li>Revise program rules to incorporate affordability and consumer protections learnings from research and evaluation of real-world projects</li> </ul>	Future

***Milestones marked as “Delayed” or “No Longer Applicable”***

The milestones marked as “Delayed” and “No Longer Applicable” have evolved and are combined with new milestones noted above.

**G.7 New York State Healthy Homes Value-Based Payment Pilot**

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan <sup>141</sup>	Status

<sup>141</sup> Milestones for 2020 and 2021 are included here for New York State Healthy Homes Value-Based Payment Pilot and were not included in the 2020 Implementation Plan.

2020		<ul style="list-style-type: none"> <li>Finalize specification list for the Healthy Homes intervention associated with the pilot</li> </ul>	Complete
		<ul style="list-style-type: none"> <li>Onboard energy services implementation contractor and health services implementation partners</li> </ul>	Complete
		<ul style="list-style-type: none"> <li>Secure submission of social determinants of health template for VBP Arrangement integration</li> </ul>	Complete
		<ul style="list-style-type: none"> <li>Finalize specification list for healthy homes interventions that address asthma and household injury</li> </ul>	Complete
2021		<ul style="list-style-type: none"> <li>Release a Request for Qualifications for pilot participating energy/housing service providers and assign pilot participation status to qualified providers</li> </ul>	Complete
		<ul style="list-style-type: none"> <li>Commence pilot field work</li> </ul>	Complete
2022		<ul style="list-style-type: none"> <li>Complete value-based payment participation toolkits for MCO/VBP providers and community-based organizations</li> </ul>	In Progress
2023		<ul style="list-style-type: none"> <li>Commence interim reporting on Year One intervention implementation</li> </ul>	Planning

		process <sup>142</sup>	
2024		<ul style="list-style-type: none"> <li>Complete draft of the full evaluation report</li> </ul>	Planning

### G.8 LMI Portfolio Marketing

Year	2020 and 2021 “Key Milestones” from 2020 IP <sup>143</sup>	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
2020 and 2021	<b>Statewide Brand:</b> <ul style="list-style-type: none"> <li>The Program Administrators expect to complete development by the first quarter of 2021</li> </ul>		In Progress
2020 and 2021	<b>NY Energy Advisor:</b> <ul style="list-style-type: none"> <li>During Q3 of 2020, the Program Administrators expect to launch an initial version of the NY Energy Advisor website, introducing customers and affordable housing property owners to the current initiative offerings</li> <li>The full NY Energy Advisor website will be launched by end of Q2 2021</li> </ul>		Complete
2020 and 2021	<b>Hard Copy Customer Education Collateral and Multilingual Communications:</b> <ul style="list-style-type: none"> <li>Hard copy customer collateral will be developed in parallel with the online NY Energy Advisor, in order</li> </ul>		In Progress

<sup>142</sup> Milestone delayed from 2022 in the April 29, 2022, Implementation Plan filing to 2023 in the November 1, 2022, Implementation Plan filing. Milestone delay due to complications of the COVID-19 pandemic, challenges in enrolling eligible Medicaid members in the Pilot, challenges in obtaining full consent from interested eligible members, and challenges maintaining engagement and continuity of Pilot services with those households who are fully consented.

<sup>143</sup> Note that the milestones listed in this column were not provided within milestones tables in the 2020 Implementation Plan. Rather, information is drawn from descriptions of Key Milestones in the 2020 Implementation Plan.

	to ensure consistent messaging and calls to action and to streamline development costs		
2020 and 2021	<b>Community-Based Marketing and Paid Advertising:</b> <ul style="list-style-type: none"> <li>Specific media and paid advertising approaches will be developed and coordinated with the statewide campaign and as initiatives are added/changed in the Portfolio</li> </ul>		In Progress
2022		<b>NY Energy Advisor:</b> <ul style="list-style-type: none"> <li>Launch a marketing campaign for the NY Energy Advisor in Q1 2022 that will continue through 2025</li> </ul>	In Progress
		<b>Hard Copy Customer Education Collateral and Multilingual Communications:</b> <ul style="list-style-type: none"> <li>Develop and distribute to stakeholders hard copy customer collateral beginning in Q1 2022 in parallel with operation of the online NY Energy Advisor, to ensure consistent messaging and calls to action and to streamline development costs. Materials available in multiple languages include posters and fact sheets.</li> </ul>	In Progress
		<b>Community-Based Marketing and Paid Advertising:</b> <ul style="list-style-type: none"> <li>Specific media and paid</li> </ul>	In Progress

		advertising approaches will be developed and coordinated with the statewide campaign and as initiatives are added/changed in the Portfolio	
2023		<b>NY Energy Advisor:</b> <ul style="list-style-type: none"> <li>Review NY Energy Advisor analytics, determining effectiveness of marketing campaigns</li> <li>Make adjustment to paid media campaigns if needed</li> <li>Continue to support the Program Administrators and stakeholders' efforts to obtain earned media</li> </ul>	Future
2024		<b>NY Energy Advisor:</b> <ul style="list-style-type: none"> <li>Continue to analyze NY Energy Advisor marketing campaigns and make corresponding campaign adjustments</li> </ul>	Future

### G.9 Community-Based Outreach, Education, and Engagement Partnerships

Year	2020 and 2021 “Key Milestones” from 2020 IP	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
2020 and 2021	<b>Expansion of Existing LMI Community Partnerships:</b> <ul style="list-style-type: none"> <li>Starting in 2021, the Program Administrators will design the community-based outreach and engagement initiative, with full implementation launch in Q2 2021 to provide timely transition from the</li> </ul>		In Progress

	<p>current CEEP Program</p> <ul style="list-style-type: none"> <li>• NYSERDA has been engaged with community partners in a co-design process to identify opportunities for improving the reach and impact of an outreach and engagement initiative within disadvantaged communities. This co-design process began in early 2020 and will inform the design of the subsequent community engagement initiative.</li> </ul>		
2020 and 2021	<p><b>Neighborhood-Based Delivery Model:</b></p> <ul style="list-style-type: none"> <li>• During the balance of 2020, the Program Administrators will assess evaluation results from the existing pilots and determine effectiveness of the neighborhood-based delivery model. If warranted, the Program Administrators will develop a replicable event/implementation plan, including consideration of remote webinar-based platforms as an alternative delivery mechanism to minimize risks associated with large, in-person events. The target for rollout would be Q3 2021.</li> </ul>		In Progress
2022		<ul style="list-style-type: none"> <li>• The Regional Clean Energy Hub network will be launched in Q3 2022, incorporating input from the 2020 co-design</li> </ul>	In Progress

		process with community partners to improve the reach and impact of outreach and engagement efforts within disadvantaged communities	
2023		<ul style="list-style-type: none"> <li>Hubs fully onboarded in the market and working with local communities to support and streamline program engagement</li> </ul>	Future
2024		<ul style="list-style-type: none"> <li>Hubs to begin launching community campaigns and local pilot programs</li> </ul>	Future

#### G.10 Community-Based Customer Engagement Initiatives

Year	2020 and 2021 “Key Milestones” from 2020 IP	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
2022		<p><b>Community-Based Customer Engagement Initiatives:</b></p> <ul style="list-style-type: none"> <li>Central Hudson plans to continue their Community Lighting Program and will distribute LEDs through Food Banks and the United Way starting again in 2022.</li> <li>Con Edison will continue to offer energy efficiency kits via an opt-in approach to customers participating in Con Edison’s Energy Affordability Program (formerly called the Low Income Discount Program) and to collaborate with food pantries to distribute LED lightbulbs.</li> </ul>	In Progress

		<ul style="list-style-type: none"> <li>National Grid will expand their LED Food Bank program to the Albany and Syracuse areas and will increase frequency to twice per year with continued collaboration with NYSEG/RGE</li> <li>Orange &amp; Rockland will expand their food bank kit offering and will provide energy efficiency kits via an opt-in approach for customers participating in the Company’s Energy Affordability Program. Additionally, Orange &amp; Rockland will expand the existing MY ORU Store e-commerce platform to include additional functionality that includes new tools, products, and offerings that will specifically engage and guide LMI customers to make energy-wise decisions for their homes.</li> </ul>	
		<p><b>Neighborhood-Based Delivery Model:</b></p> <ul style="list-style-type: none"> <li>During the balance of 2022, the Program Administrators will assess evaluation results from the existing pilots and determine effectiveness of the neighborhood-based delivery model. If warranted, the Program Administrators will develop a replicable event/implementation plan, including</li> </ul>	In Progress



		consideration of remote webinar-based platforms as an alternative delivery mechanism to minimize risks associated with large, in-person events. This event/outreach strategy would be implemented beginning in 2022 after final evaluation results are determined.	
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### G.11 Evaluation, Measurement, & Verification Approach

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Status
2022		<ul style="list-style-type: none"> <li>Continued ongoing meetings between Program Administrator VGS teams</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Refine and finalize standardized survey questions to be used when conducting process evaluation research</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Complete 2017-Q1 2019 evaluation of EmPower NY Program, on target to be finished by NYSERDA in Q4 2022</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Begin to develop and implement average existing condition baselines, facilitated through the TRM Management Committee, and identify key LMI measures for further research</li> </ul>	In Progress
		<ul style="list-style-type: none"> <li>Select EM&amp;V vendor for AMEEP evaluations to be undertaken in 2023</li> </ul>	Planning
		<ul style="list-style-type: none"> <li>Assess impact of NYS Clean Heat coordination with AMEEP and any resulting evaluation needs</li> </ul>	Planning
2023		<ul style="list-style-type: none"> <li>Begin EmPower+ evaluation process</li> </ul>	Future
		<ul style="list-style-type: none"> <li>Develop the workplan and conduct statewide evaluation for AMEEP, as operated in 2022</li> </ul>	Future

## Appendix H: Scorecard Program Mapping to Implementation Plan Statewide Categories

This appendix maps individual LMI programs as identified in Program Administrators’ quarterly scorecard reporting to Implementation Plan Statewide Categories and Sub-Initiatives.

### H.1 Central Hudson

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>144</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY	Electric	Empower (Electric)	CH-E-L-R-22				
Existing Affordable Multifamily Buildings	AMEEP	Electric	Clean Heat (CH) & Affordable Multifamily Energy Efficiency Program (AMEEP)	CH-E-M-X-21				
Customer Awareness, Outreach & Engagement	Distribution of LEDs through food banks and the United Way	Electric	Community Lighting <sup>145</sup>	CH-E-M-R-5				
Existing 1-4 Family Homes	EmPower NY	Gas	Empower (Gas)	CH-G-L-R-23				

<sup>144</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

<sup>145</sup> Central Hudson’s community lighting program described in the Community-Based Outreach, Education, and Engagement Partnerships section of the Implementation Plan was historically accounted for under market rate programs. Since the initiative was created to support and engage with LMI customers in our service territory, the Community Lighting program was moved under the Statewide LMI Portfolio in 2021.

Existing Affordable Multifamily Buildings	AMEEP	Gas	Affordable Multifamily Energy Efficiency Program (AMEEP)	CH-G-L-M-20				
Customer Awareness, Outreach & Engagement		Gas						

## H.2 Con Edison

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>146</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY	Electric	Empower Electric	CE-E-L-R-32N				
Existing Affordable Multifamily Buildings	AMEEP	Electric	Affordable Multifamily Energy Efficiency Program (AMEEP) Electric	CE-E-L-M-5N	Multifamily - LMI	CE-E-L-M-4N	Multifamily - LMI	CE-E-L-M-4N
Customer Awareness, Outreach & Engagement	Energy Conservation Kits Program for EAP customers	Electric	Efficiency Starter Program - LMI	CE-E-L-R-14N	Efficiency Starter Program - LMI	CE-E-L-R-14N	Efficiency Starter Program - LMI	CE-E-L-R-14N
	Food banks LED distribution	Electric	Retail Lighting - LMI	CE-E-L-R-25N	Retail Lighting - LMI	CE-E-L-R-25N	Retail Lighting - LMI	CE-E-L-R-25N
	Home Energy Reports	Electric					Residential Home Energy Reports - LMI	CE-E-L-R-17N
Existing 1-4 Family Homes	EmPower NY	Gas	Empower Gas	CE-G-L-R-32N				

<sup>146</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

Existing Affordable Multifamily Buildings	AMEEP	Gas	Affordable Multifamily Energy Efficiency Program (AMEEP) Gas	CE-G-L-M-5N	Multifamily - LMI	CE-G-L-M-4N	Multifamily - LMI	CE-G-L-M-4N
Customer Awareness, Outreach & Engagement	Energy Conservation Kits Program for EAP customers	Gas	Efficiency Starter Program - LMI	CE-G-L-R-14N	Efficiency Starter Program - LMI	CE-G-L-R-14N	Efficiency Starter Program - LMI	CE-G-L-R-14N
	Home Energy Reports	Gas					Residential Home Energy Reports - LMI	CE-G-L-R-17N

### H.3 National Grid (KEDLI)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>147</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	KEDLI HEAT	Gas	Gas LMI - Existing 1-4 Family Homes Program	KL-G-L-R-12	Gas LMI - Existing 1-4 Family Homes Program	KL-G-L-R-12		
Existing Affordable Multifamily Buildings	AMEEP	Gas	Gas LMI - Existing Affordable Multifamily Program	KL-G-L-M-13				
Customer Awareness, Outreach & Engagement	Customer Awareness, Outreach, & Engagement Program	Gas	Gas LMI - Customer Awareness, Outreach, & Engagement Program	KL-G-L-R-10				

<sup>147</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

#### H.4 National Grid (KEDNY)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>148</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY	Gas	Gas LMI - Existing 1-4 Family Homes Program	KN-G-L-R-12				
Existing Affordable Multifamily Buildings	AMEEP	Gas	Gas LMI - Existing Affordable Multifamily Program	KN-G-L-M-13				
Customer Awareness, Outreach & Engagement	Customer Awareness, Outreach, & Engagement Program	Gas	Gas LMI - Customer Awareness, Outreach, & Engagement Program	KN-G-L-R-10				

<sup>148</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and targets reported in the body of this Implementation Plan.



### H.5 National Grid (NMPC)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>149</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY	Electric	Electric LMI - Existing 1-4 Family Homes Program	NM-E-L-R-16				
Existing Affordable Multifamily Buildings	AMEEP	Electric	Electric LMI - Existing Affordable Multifamily Program	NM-E-L-M-17				
Customer Awareness, Outreach & Engagement	LED Food Bank Program	Electric	Electric LMI - Customer Awareness, Outreach, & Engagement Program	NM-E-L-R-14				
Existing 1-4 Family Homes	EmPower NY	Gas	Gas LMI - Existing 1-4 Family Homes Program	NM-G-L-R-12				

<sup>149</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

Existing Affordable Multifamily Buildings	AMEEP	Gas	Gas LMI - Existing Affordable Multifamily Program	NM-G-L-M-13				
Customer Awareness, Outreach & Engagement	Customer Awareness, Outreach, & Engagement Program	Gas	Gas LMI - Customer Awareness, Outreach, & Engagement Program	NM-G-L-R-10				

## H.6 National Fuel Gas

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>150</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY	Gas	EmPower	NF-G-LMI-R-3J	EmPower	NF-G-LMI-R-3J	EmPower	NF-G-LMI-R-3J
Existing Affordable Multifamily Buildings	AMEEP	Gas	Affordable Multifamily Energy Efficiency Program (AMEEP)	NF-G-LMI-R-4J				
Customer Awareness, Outreach & Engagement <sup>151</sup>		Gas						

<sup>150</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

<sup>151</sup> National Fuel Gas's weatherization kits program described in the Community-Based Outreach, Education, and Engagement Partnerships section of the IP does not report savings. Spend is included as part of Market Rate Portfolio Administration.

### H.7 New York State Electric & Gas (NYSEG)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>152</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY	Electric	LMI 1-4 Family Homes	NS-E-L-R-7	LMI Residential Electric	NS-E-L-R-7	LMI Residential Electric	NS-E-L-R-7; NS-E-L-R-7A
Existing Affordable Multifamily Buildings	AMEEP	Electric	The Affordable Multifamily Energy Efficiency Program	NS-E-L-M-6	LMI Multifamily Program	NS-E-L-M-6	LMI Multifamily Program	NS-E-L-M-6; NS-E-L-M-6A
Customer Awareness, Outreach & Engagement	Food Banks, Distributions to EAP, School Kits	Electric	LMI Distributions	NS-E-L-R-77				
	LMI Retail Lighting	Electric	Retail Lighting LMI	NS-E-L-R-75A				
Existing 1-4 Family Homes	EmPower NY	Gas	LMI-Residential Gas	NS-G-L-R-23	LMI Residential Gas	NS-G-L-R-23	LMI Residential Gas	NS-G-L-R-23; NS-G-L-R-23A

<sup>152</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

Existing Affordable Multifamily Buildings	AMEEP	Gas	The Affordable Multifamily Energy Efficiency Program	NS-G-L-M-22	LMI Multifamily Program	NS-G-L-M-22	LMI Multifamily Program	NS-G-L-M-22; NS-G-L-M-22A
Customer Awareness, Outreach & Engagement		Gas	LMI Distributions	NS-G-L-M-79				

### H.8 Orange & Rockland

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>153</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY	Electric	LMI Electric - EmPower	OR-E-M-R-11				
Existing Affordable Multifamily Buildings	AMEEP	Electric	LMI Electric - AMEEP	OR-E-M-R-13				
Customer Awareness, Outreach & Engagement	Food Banks, EE Kits, LMI Marketplace	Electric	LMI Electric – Customer Engagement	OR-E-M-R-15				
Existing 1-4 Family Homes	EmPower NY	Gas	LMI Gas - EmPower	OR-G-M-R-12				
Existing Affordable Multifamily Buildings	AMEEP	Gas	LMI Gas - AMEEP	OR-G-M-R-14				
Customer Awareness, Outreach & Engagement	EE Kits, LMI Marketplace	Gas	LMI Gas – Customer Engagement	OR-G-M-R-16				

<sup>153</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

### H.9 Rochester Gas & Electric (RG&E)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>154</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY	Electric	LMI 1-4 Family Homes	RG-E-L-R-39	LMI Residential Electric	RG-E-L-R-39	LMI Residential Electric	RG-E-L-R-39; RG-E-L-R-39A
Existing Affordable Multifamily Buildings	AMEEP	Electric	The Affordable Multifamily Energy Efficiency Program	RG-E-L-M-38	LMI Multifamily Program	RG-E-L-M-38	LMI Multifamily Program	RG-E-L-M-38; RG-E-L-M-38A
Customer Awareness, Outreach & Engagement	Food Banks, Distributions to EAP customers, School Kits	Electric	LMI Distributions	RG-E-L-R-78				
	LMI Retail Lighting	Electric	Retail Lighting LMI	RG-E-L-R-76A				
Existing 1-4 Family Homes	EmPower NY	Gas	LMI 1-4 Family Homes	RG-G-L-R-55	LMI Residential Gas	RG-G-L-R-55	LMI Residential Gas	RG-G-L-R-55; RG-G-L-R-55A

<sup>154</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

Existing Affordable Multifamily Buildings	AMEEP	Gas	The Affordable Multifamily Energy Efficiency Program	RG-G-L-M-54	LMI Multifamily Program	RG-G-L-M-54	LMI Multifamily Program	RG-G-L-M-54; RG-G-L-M-54A
Customer Awareness, Outreach & Engagement		Gas	LMI Distributions	RG-G-L-R-80				



### H.10 New York State Energy Research & Development Authority

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name <sup>155</sup>	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower NY		Single Family- Low income	ND-E-L-R-65	Single Family- Low income	ND-E-L-R-65	Single Family- Low income	ND-E-L-R-65
	AHP		Single Family- Moderate Income	ND-E-L-R-66	Single Family- Moderate Income	ND-E-L-R-66	Single Family- Moderate Income	ND-E-L-R-66
Existing Affordable Multifamily Buildings	Multi-Year Affordable Housing Partnerships, Technical Assistance for Affordable Multifamily Buildings		LMI Multifamily	ND-E-L-M-28a; ND-E-L-M-28b	LMI Multifamily	ND-E-L-M-28a; ND-E-L-M-28b	LMI Multifamily	ND-E-L-M-28a; ND-E-L-M-28b
	RetrofitNY		RetrofitNY-LMI	ND-E-L-M-61	RetrofitNY-LMI	ND-E-L-M-61	RetrofitNY-LMI	ND-E-L-M-61

<sup>155</sup> 2022 scorecard IDs are used to report actual savings and spend in 2022 and may differ from projected 2022 budgets and benefits reported in the body of this Implementation Plan.

Affordable New Construction	Affordable New Construction Housing Program		Low Rise New Construction Transition	ND-E-L-C-30	Low Rise New Construction Transition	ND-E-L-C-30	Low Rise New Construction Transition	ND-E-L-C-30
			Multifamily New Construction Transition	ND-E-L-M-39	Multifamily New Construction Transition	ND-E-L-M-39	Multifamily New Construction Transition	ND-E-L-M-39
			New Construction-LMI	ND-E-L-C-42; ND-E-L-M-42; ND-E-L-R-42	New Construction-LMI	ND-E-L-C-42; ND-E-L-M-42; ND-E-L-R-42	New Construction-LMI	ND-E-L-C-42; ND-E-L-M-42; ND-E-L-R-42
Customer Awareness, Outreach & Engagement	LIFE		Low Income Forum on Energy	ND-E-L-X-32				
	Regional Clean Energy Hubs		Regional Clean Energy Hubs	ND-E-L-X-88				
	REVitalize		REVitalize	ND-E-L-C-64				
Pilots and Demonstrations	LMI Pilots		LMI Pilots	ND-E-L-X-29				
LMI Solar	Solar for All		Solar for All	ND-E-L-X-69				
Beneficial Electrification	LMI Heat Pump Pilot		Heat Pumps Phase 2	ND-E-L-R-24				

Additional LMI Initiatives	Healthy Homes		Healthy Homes Feasibility Study	ND-E-L-R-22	Healthy Homes Feasibility Study	ND-E-L-R-22	Healthy Homes Feasibility Study	ND-E-L-R-22
			NYS Healthy Homes Value Based Payment Pilot	ND-E-L-R-48	NYS Healthy Homes Value Based Payment Pilot	ND-E-L-R-48	NYS Healthy Homes Value Based Payment Pilot	ND-E-L-R-48