

Comments on Buildings Chapter 12

- Overview
 - We broadly support strategies in this chapter. They have clear intent and are appropriately aggressive.
 - Developing stakeholder buy-in is key for all Climate Plan communication and outreach efforts, beginning with this Scoping Plan document.
 - Financial and technical support to building owners and tenants is critical:
 - Strongly support direct cash incentives
 - Absolutely need to greatly improve and design in ease-of-access and standardization across programs, agencies and public utilities to scale adoption by applicants, installers and advisors
 - Specifically, financial support mechanisms need to address the “split incentive” issue to address the common barrier that the site owner investing capital in energy improvements doesn’t receive on-going benefits from energy savings because utility bills are paid by their tenants. Fair safeguards are needed such that energy improvements don’t drive significant rent increases as the primary way building owners get a return on their investment in energy efficiency and building electrification.
 - Building maintenance
 - Deferred maintenance (energy and non-energy related) often needs to be addressed during upgrades and should be funded too, especially for substandard housing in LMI and climate justice communities
 - Decarbonization efforts should institutionalize ongoing building maintenance and optimization
 - It is critical to work on economy-wide strategies for how building owners will be supported financially and logistically to comply with recommended policies and regulations. New Yorkers need answers to the questions, for example, of who and how will we pay for:
 - commercial energy benchmarking, audits and reporting
 - HERS ratings of single family buildings sale listings
 - helping owners understand lifecycle costs and savings
 - Refrigerant (HFC) reclamation and disposal
 - scaled up weatherization programs
 - Existing and new incentive and technical support programs need much more communication and coordination between and within state agencies, utilities and other market actors to attract and support more, and more diverse, participants and make decarbonization easier for all parties
 - Emissions overview box needs clarification of “emissions from imported fuels”
 - Disagree that supplemental heat for peak cold conditions will be needed by large buildings downstate heated with cold climate heat pumps if building envelopes perform well thermally
 - Energy efficient building envelopes should be included as an electric load flexibility measure because it makes space conditioning more persistent

(buildings cool more slowly in winter, heat more slowly in summer) which means that electrically powered HVAC can more readily participate as a grid edge demand management resource

- Recommend this chapter lists the health benefits of building decarbonization including improved indoor air quality from removing gas emissions, leaks, and incomplete combustion; the opportunity to reduce mold issues and provide dehumidification as secondary benefit of heat pumps; more protection from extreme outdoor temperatures; and co-incident repair of non-energy safety and structural issues.

- B2 Adopt Standards for Zero Emissions Equipment and the Energy Performance of Existing Buildings
 - Local government adoption of the NY Stretch Energy Code” isn’t going very well at the moment. Motivated by the Clean Energy Communities program, some municipalities are taking this on, but most don’t see value or have sufficient time to evaluate and develop support for adoption. Very much agree that “The State should provide additional funding for local code enforcement...”.
 - Discussion of energy efficiency lighting upgrades to commercial and common spaces in 25,000SF and larger buildings should be more specific and name LED technology.

- B4 Scale Up Public Financial Incentives
 - Especially like recommendation of district scale thermal conversions and creation of community resilience hubs. Good way to scale up and build on “we’re in this together” mindset

- B5 Expand Access to Public and Private Low-Cost Financing
 - Strongly support the recommendations for Energy Savings Performance Contracting, Design/Build and integrated project delivery methods

- B6 Align Energy Price Signals with Policy Goals
 - Strongly support an economy-wide strategy that prices GHG emissions as this directly affects lifecycle Return on Investment of deep decarbonization projects
 - Historically and continuing even today, energy price signals (the low cost of natural gas in much of the state) make it difficult for most building owners (including state agencies, school districts and municipalities) to cost-justify electrification when considering investments in building improvements.
 - When aligning electric rates need to consider demand (\$/kW) to be as important as consumption (\$/kWh.) This is also true of energy efficiency measures.

- B8 Scale Up Public Awareness and Consumer Education
 - This is vital and can drive workforce and economic development, along with the decarbonization of buildings and resulting improved public health¹

- Should be targeted to get the right message to the right audience to drive specific program participation and policy compliance
 - K12 and college students should be a focus because they are future entrepreneurs, workers, consumers, and early adopters of new technologies
- B11 Advance a Managed and Just Transition from Reliance on HFC Use
 - Strongly support the need for this strategy. Emphasize that market mechanisms or economic support that pays HVAC contractors and appliance installers to recover and retire HFCs is absolutely vital, and needs to be embedded into workstreams for hassle-free transactions. Financial reward is what will drive participation in education and training, and make more likely industry compliance with regulations that are very difficult to enforce in the field.