



December 18, 2023

Doreen Harris  
President and Chief Executive Officer  
New York State Energy Research and Development Authority  
17 Columbia Circle  
Albany, NY 12203-1091

**Re: Public Comment on the Inflation Reduction Act Home Energy Rebates**

Dear President Harris:

Thank you for the opportunity to provide public comments on the Inflation Reduction Act (IRA) Home Energy Rebate Programs.

ACE NY is a member-based organization with a mission of promoting the use of clean, renewable electricity technologies and energy efficiency in New York State to increase energy diversity and security, boost economic development, improve public health, and reduce air pollution. ACE NY's diverse membership includes companies engaged in the full range of clean energy technologies as well as consultants, academic and financial institutions, and not-for-profit organizations interested in their mission.

Our main recommendations for NYSERDA as outlined below are:

- Information on how programs will be braided together
- Tool to ease access to IRA and NE:NY programs
- Attestation for income requirements
- Disadvantaged communities
- Measured and modeled energy savings pathways
- Encourage regular meetings with stakeholders

Our comments are included below. Thank you again for the opportunity, and we look forward to working with New York to successfully implement these important programs.

Sincerely

Deb Peck Kelleher  
Deputy Director  
Alliance for Clean Energy New York  
dpeckkelleher@aceny.org

New York has ambitious goals of 70% renewable electricity by 2030 and 100% emissions-free electricity by 2040, as well as a net zero state economy by 2050, as set forth in the Climate Leadership and Community Protection Act (“CLCPA”). Furthermore, New York has a goal to achieve 2 million climate-friendly homes by 2030. To accomplish these goals, the state must rapidly deploy a diverse mix of advanced energy resources, while making more efficient and electrifying most end-uses of energy in buildings. Energy efficiency and building electrification are two important parts of meeting our climate goals.

NYSERDA should ensure that the roll out of the IRA Home Energy Rebates occur in a timely manner. The Clean Energy Hubs will be an excellent system for disseminating information about the program and identifying enrollees.

### **Information on how Programs will be Braided Together**

Although few details were shared during the December 6<sup>th</sup> presentation, ACE NY supports NYSERDA in maximizing the Rebate Programs impact by braiding funding sources. ACE NY encourages NYSERDA to share more details on the ability to braid programs as they become available. The state’s utilities, agencies and NYSERDA offer additional programs to support the weatherization and decarbonization of our buildings, and residents should be able to maximize access to all these fund sources.

### **Tool to Ease Access to IRA and NE:NY Programs**

There are a range of programs with differing eligibility that New Yorkers can access to weatherize and electrify their homes. NYSERDA should develop a tool for contractors, and home and building owners to use to assess their eligibility to both IRA programs and tax credits, and other utility and NYSERDA efficiency programs. Given the complexity of options, NYSERDA should develop a resource that contractors, homeowners and Clean Energy Hubs can utilize to present their options, reduce market confusion and to ease in their decision making.

### **Attestation for Income Requirements**

ACE NY supports the use of self-attestation of an applicant’s income to reduce the hurdles needed to access the IRA rebate programs. In addition, income eligibility should also be confirmed if an applicant is currently enrolled in a utility’s bill assistance program, or receiving other income determined assistance from the State. NYSERDA should reduce the steps to access the IRA Rebate Programs.

### **Disadvantaged Communities**

At the December 6<sup>th</sup> presentation, there was a brief mention of funding dedicated to Disadvantaged Communities (DAC) and to Justice 40 locations. It was unclear if the IRA Rebate Programs would limit DAC funding to identified DAC locations, or would it also apply to those low income New Yorkers eligible for clean energy and energy efficiency investments that are included in the DAC criteria under the low-income household criteria[1]. NYSERDA should specify which residents are eligible for DAC funding.

In addition to the geographic DAC criteria discussed above, and solely for the purpose of ensuring access to the State’s energy affordability investments. Figure 1 below shows the additional low-income households outside of geographic DACs added through the low-income household criteria

### **Measured and Modeled Energy Savings Pathways**

ACE NY encourages NYSERDA to offer both the modeled and measured energy savings pathways of the Home Efficiency Rebate (HER) program to provide options to the market. For example, contractors should be allowed to use the pathway with which they have the most familiarity and competency. The flexibility to use either pathway will allow more contractors to access the HER program. Both approaches offer benefits to the market. The modeled approach may be perceived to be easier to use for multifamily buildings and opens options for homes without historical energy usage data. On the other hand, the measured approach will bolster equity by providing higher rebates to low-income households and properly incentivize quality, delivering tangible impacts. New York is especially well positioned to use embedded M&V to track realization rate compliance (70%) for both the modeled and measured pathways. This is due to its long history of evaluation in the state and specific experience with open-source advanced M&V using the OpenEEmeter to enable targeting and monitor program impacts.

### **Encourage Regular Meetings with Stakeholders**

ACE NY encourages NYSERDA to hold more regular meetings with stakeholders, contractors, and other interested parties. The IRA Rebate programs have a wide variety of people that will be implementing these programs. It is important that NYSERDA take steps to reach beyond its usual stakeholders, and include outreach to environmental justice organizations, Clean Energy Hub organizations, and those that are not currently part of existing stakeholder meetings.

NYSERDA should take steps to keep the public informed on the application status to the Department of Energy (DOE), including any accelerated applications that are submitted. Draft Implementation Plans should also be shared with the public. This will give the contractor community the ability to prepare for the official start of the program.

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[1] “For the purposes of the accounting of clean energy and energy efficiency investments, households with annual income at or below 60% of State Median Income or are otherwise categorically eligible for low-income programs (i.e. Home Energy Assistance Program), are included in the criteria. These households can be located anywhere in the State and are included to capture rural poverty due to the high correlation between geographic indicators and high population centers.” [https://climate.ny.gov/-/media/Project/Climate/Files/Disadvantaged-Communities-Criteria/LMI-daccriteria-fs-1-v2\\_acc.pdf](https://climate.ny.gov/-/media/Project/Climate/Files/Disadvantaged-Communities-Criteria/LMI-daccriteria-fs-1-v2_acc.pdf)