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November 3, 2023

Cost-Effectiveness Criteria Comments
NYSERDA
17 Columbia Circle
Albany, New York 12203

Re: Comments on Proposed Cost-Effectiveness Criteria to Update the Energy Code

The Alliance for Clean Energy New York is writing in support of the proposed Evaluation Criteria for Determining Cost-Effectiveness of Updates to the Energy Conservation Code of New York State. We appreciate the opportunity to provide comments on the proposed criteria.

The mission of the Alliance for Clean Energy New York (ACE NY) is to promote the use of clean, renewable electricity technologies and energy efficiency in New York State, in order to increase energy diversity and security, boost economic development, improve public health, and reduce air pollution. ACE NY members are a mix of private companies and nonprofit organizations interested in promoting clean energy and creating opportunities for growth in New York's clean energy economy.

The proposed criteria include using the Department of Environmental Conservation's (DEC) Establishing a Value of Carbon Guidelines for use by state agencies. ACE NY would note that these guidelines do not currently include a calculation methodology for the benefits to public health for switching away from fossil fuels, even though the guidelines repeatedly mention the importance of including these benefits in the social cost of carbon. ACE NY would suggest that NYSERDA utilize the tools developed by the U.S. Environmental Protection Agency (EPA) to assess how policy changes affect public health. The EPA's CO-Benefits Risk Assessment ([COBRA](#)) screening model is a free tool that models how clean energy policies, including energy efficiency programs, affect human health at the local level. The COBRA also estimates the economic value of the health benefits associated with policies changes.

The Alliance for Clean Energy New York is supportive of the recent updates to the State building code, and the All-Electric Buildings Act. The building sector is the largest source of greenhouse gas emissions from our heating, cooling and hot water systems that are fueled by heating oil or natural gas. Couple this with recently released studies that show the level of indoor air pollution from the use of natural gas stoves, we need to ensure that social cost of carbon includes the public health benefits of reducing the combustion of fossil fuels, especially those that occur in living spaces.

Thank you for your consideration of ACE NY's comments and let me know if you need additional information.

Sincerely,
/s/

Deb Peck Kelleher
Deputy Director
Alliance for Clean Energy New York