Dear Governor Cuomo:

Thank you for your recent announcement to reassert New York’s national leadership on energy efficiency by proposing a new comprehensive energy efficiency initiative by Earth Day 2018. Our organizations enthusiastically support a bold and aggressive energy efficiency policy for New York and stand ready to work with you to craft and implement this exciting new framework.

Our organizations support energy efficiency because of its many diverse benefits: lower utility bills, reduced carbon and other harmful pollution; new, local jobs for New Yorkers; and, a more reliable electric grid. Investment in efficiency is cost-effective and can avoid expensive grid investments, providing a critical tool in the fight against climate change, improving air quality and public health, and helping to address energy affordability.

New York’s energy efficiency initiative should be nation-leading and ambitious, with a quantitative goal that is fuel-neutral. It should also:

- **Grow Clean Energy Businesses and Create Jobs.** The Efficiency Initiative should be designed to harness the efficiency market and grow additional opportunities for energy efficiency businesses in New York that currently employ 110,000 New Yorkers. Embracing the principles of REV, and the creation of sustainable financing mechanisms, this Initiative should recognize and monetize the benefits of efficiency; compensate providers for those benefits; and, create a competitive procurement to get the most value for customers.

- **Require a Strong Utility Role.** While the overarching efficiency goals will be met by a variety of program components, the most important is an ambitious mandate for utilities, which have the ability to procure efficiency quickly and at scale, and to directly engage customers with clean and efficient energy opportunities, including energy efficiency and electric clean heating and cooling. Utilities should be incentivized and rewarded for meeting ambitious mandates that gradually ramp up electric energy efficiency targets from current levels of roughly .9 percent per year, to a minimum level of 3 percent per year, as is being achieved in leading states. Similar to the 50 x ‘30 renewables target of the Clean Energy Standard, this mandate is essential to provide the critical and predictable policy framework that will encourage greater long-term private sector investment in energy efficiency. Comparable savings levels should also be facilitated/delivered by both NYPA and LIPA.

- **Build in Diversity and Equity.** The Efficiency Initiative should ensure access to energy efficiency for all New Yorkers, especially low- to moderate- income customers, and environmental and climate justice communities. A strong, sustainable, and successful program is one that reaches traditionally underserved markets, is geographically equitable, helps lower energy costs, and improves efficiency for all customer classes: residential, multifamily (including multifamily affordable housing), commercial, and industrial.

- **Drive the Consumer Market.** Modernized building energy codes that are regularly and automatically updated and appliance efficiency standards that reflect cutting-edge technology are important companions to a strong utility role and to innovative market transformation efforts by NYSERDA and other entities in expanding energy efficiency. These measures will drive efficiency into products and building design. We strongly support your administration in putting forward State legislation on building codes and appliance standards and aggressively advancing these proposals in the Legislature.
A program that meets these criteria will bring great benefits to New York: clean energy jobs, climate change progress, and utility bill savings. We look forward to celebrating its release at Earth Day 2018 and appreciate your attention to this important issue.

Sincerely,
Alliance for Clean Energy New York
Natural Resources Defense Council
Association for Energy Affordability
Citizens for Local Power
Environmental Defense Fund
Home Performance Coalition
American Lung Association in New York
Northeast Energy Efficiency Partnerships
New York Geothermal Energy Organization
Sierra Club
Riverkeeper
Building Performance Contractors’ Association
Citizens Campaign for the Environment
The Sallan Foundation
Hudson River Sloop Clearwater, Inc.
New York Communities for Change
Environmental Advocates of New York
350 NYC
350.org
350 Brooklyn
New Yorkers for Clean Power
Scenic Hudson
Pace Energy and Climate Center
New York Public Interest Research Group
Catskill Mountainkeeper
Environmental Entrepreneurs
Alliance for a Greater New York (ALIGN)
Urban Green Council
Acadia Center
Action for a Better Community
Airtight Services, Inc.
Bensol Tech LLC
CNY Weatherization Services
Coler Natural Insulation
Cutone & Company LC Associates
ECS Better Homes
Energy Construction LLC
Energy Efficiency Solutions NY, Inc.
EnergyPro Insulation
Get Green Home Improvements
Greenhill Contracting Inc.
Hanac Weatherization
Health Home Energy & Consulting, Inc.
Home Energy Consultants, Inc.
Sealed
Solar Energy Haus, Inc.
Yadav Solutions
E4TheFuture
Lime Energy
Open Energy Efficiency
Sane Energy Project
Northwest Bronx Community & Clergy Coalition (NWBCCC)
TRC Solutions
Woltner Summit Contracting LLC.
Taitem Engineering
Rochester People's Climate Coalition
Greenpathway Consultants
United for Action
Damascus Citizens for Sustainability

CC: Richard Kauffman, Chairman of Energy & Finance
John Rhodes, PSC Chair
Alicia Barton, President/CEO NYSERDA
Gil Quinones, President/CEO NYPA
Adam Zurofsky, Deputy Secretary for Energy
Peter Olmsted, Assistant Deputy Secretary for Energy