

April 29, 2019

The Honorable Andrew M. Cuomo
Governor of New York State
NYS Capitol Building
Albany, NY 12224

Re: Moving Forward on Building Codes and Appliance Standards

Dear Governor Cuomo:

Thank you for your extraordinary leadership on climate, especially recent efforts to reinforce the importance of energy efficiency as our first fuel, and the critical foundation of your legacy of clean energy for New York, expected to deliver one third of the goal of 40 percent reduction in greenhouse gases by 2030. In December, *New Efficiency: New York* laid out a nation leading goal of reaching 185 TBtu savings by 2025, and in your January State of the State address, you detailed some of the important measures to happen in 2019 to implement these efficiency goals by reducing energy use in buildings, which are responsible for 60% of greenhouse gas pollution in New York, including appliance standards and strengthening building energy codes. We write today to highlight the opportunity in this legislative session to accomplish huge energy and cost savings through the implementation of appliance standards, building code acceleration, building energy benchmarking and building energy labeling.

Specifically, *New Efficiency: New York* included the energy saving opportunities from building energy benchmarking, disclosure, and labeling (p. 48). Cities, including New York City, have seen energy reductions by creating information transparency around buildings' energy use, and enabling informed energy decisions by owners and lessees. Appliance standards set by New York (p. 61) are another large opportunity, with estimates showing annual carbon and bill savings of 650,000 metric tons and \$145 million in 2025, respectively, and growing over time (see attached fact sheet based on analysis of 18 products by the Appliance Standards Awareness Project). And building codes (p. 62) to be updated more frequently, to be designed with other progressive states to focus on carbon metrics and beneficial electrification, and to be strengthened to "stretch code" levels, as New York City has already done, are also important and will yield large savings for new and substantially renovated buildings. These actions in concert are expected to deliver 7 TBtu of the overall 2025 efficiency goals in *New Efficiency: New York*.

The federal government through the Department of Energy has abdicated its legal mandate to set new appliance standards, and is actively working to roll back and undermine existing standards (standards that have saved Americans \$2 trillion in energy bills over the past 30 years, and would avoid seven billion tons of carbon by 2030). It is critical that New York State join other leading states that have passed or are considering new state level standards, including California, Connecticut, Washington, Vermont, Massachusetts, Rhode Island, Colorado, and Hawaii. The impacts of your leadership through state action on this issue cannot be overstated, and we could not say it better than *New Efficiency: New York*:

As the federal government scales back its role in setting and enforcement of appliance efficiency standards, advancement of standards at the state level is needed. New York's leadership on this front, together with California and other states, especially in the Northeast, would go far in setting de facto national standards given the size of the consumer market of the states advancing new standards.

Moving forward on codes and standards also helps achieve the Reforming the Energy Vision goals of empowering more informed energy choices, improving existing energy infrastructure, creating new jobs and business opportunities, protecting natural resources, building a more resilient energy system, and of course, growing energy efficiency in New York.

Your continued leadership on climate, clean energy and efficiency in the face of worsening federal action would be strengthened by capturing the benefits of appliance standards, building codes, and energy labeling. Doing so will further expand the promise of efficiency for our state by: 1) increasing efficiency jobs, which are already the biggest and fastest growing green jobs sector; 2) reducing emissions quickly and cheaply; and 3) saving New Yorkers money on their utility bills.

Sincerely,

Association for Energy Affordability, Valerie Strauss

Alliance for Clean Energy New York, Anne Reynolds

Building Performance Contractors' Association of New York State, Conrad Metcalfe

E4TheFuture, Steve Cowell

Fossil Free Tompkins, Irene Weiser

The Home Performance Coalition, J. Joseph Cullen

Natural Resources Defense Council, Samantha Wilt

New Yorkers for Clean Power, Elizabeth Broad

NY-Geothermal Energy Organization, Bill Nowak

New York League of Conservation Voters, Julie Tighe

Green Education and Legal Fund, Mark Dunlea

Riverkeeper, Jeremy Cherson

Rochester People's Climate Coalition, Abigail McHugh-Grifa

350 NYC, Deirdre Aherne

TRC Companies, Robert Callender

United for Action, Mevrian Thomas

Cc: Alicia Barton, President and CEO, New York State Energy Research and Development Authority
John Rhodes, Chairman, Public Service Commission
Melissa DeRosa, Secretary to the Governor
Dale Bryk, Deputy Secretary for Energy and the Environment
Amanda Lefton, First Assistant Secretary for Energy and the Environment