

November 10, 2025

Hon. Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

RE: Comments on the Regional Residential Weatherization Implementation Plans filed in Case 25-M-0248 – Energy Efficiency and Building Electrification

Dear Secretary Phillips,

The following organizations respectfully submit these comments regarding the Regional Residential Weatherization Implementation Plans filed by New York's investor-owned utilities pursuant to the Public Service Commission's (PSC) May 15, 2025 Order Authorizing Non-LMI Energy Efficiency and Building Electrification (EE/BE) Portfolios for 2026- 2030.

Our groups represent a broad coalition of community based organizations, environmental advocates, and industry and market stakeholders working together to advance affordable, equitable building decarbonization. We have a deeply shared interest in investing in LMI and disadvantaged communities, making programs simpler for customers and contractors, and integrating health and safety as part of the investment decision making related to the EE/BE programs. We appreciate the PSC's leadership in directing utilities to develop regional weatherization programs to support these ends and encourage continued concerted effort to further them.

Weatherization must be understood not only as a key affordability solution but also as an energy system resource that reduces load, reduces gas throughput, provides healthier and safer homes and supports electrification readiness.

Our intent in submitting these comments is to help ensure that the implementation of these programs achieves maximum impact for all New Yorkers, especially low and moderate income (LMI) households and disadvantaged communities (DACs), who can stand to benefit the most with careful alignment with energy efficiency and electrification incentives and LMI dedicated programs. A shift from a "house-by-house" approach to neighborhood level project deployment, and establishment of clear oversight structures will further ensure they can effectively be part of the foundational infrastructure for New York's energy transition.

Importance of Regional Programs such as the Residential Weatherization Programs

We strongly support taking a regional approach to EE/BE programs where feasible, such as presented in the Upstate and Downstate Implementation Plans. A regional or neighborhood-scale approach can help align budgets and vendor delivery and reduce

administrative and contractor onboarding costs, facilitate customer engagement, improve market predictability and continuity across service territories and increase the volume and speed of efficiency and electrification work statewide.

However, as currently proposed, the programs still largely depend on homeowners or building owners initiating projects, leading to a “house by house” delivery model. This approach is insufficient to meet the scale and pace required to meet New York’s climate law requirements. We have heard from utilities in various venues about their struggle with customer uptake with this approach.

We recommend shifting toward more coordinated neighborhood or block-level deployment which would support lowered soft costs and faster delivery, better geographic targeting, and more equitable reach, by targeting DAC areas and areas that currently are designated or are good candidates for non-pipe and non-wire alternatives, as well as identifying areas that are good candidates for gas system pruning. This will require close collaboration across program administrators (utilities) and the PSC, as well as increasing community awareness and trust building through work with community based organizations. Regional programs represent a major opportunity to create a replicable statewide model for neighborhood-scale building decarbonization.

Alignment and Coordination

To realize this potential, these programs must be explicitly aligned with other programs including NYSERDA’s EmPower+, Technical Assistance Programs, Comfort Homes Program, AMP-Up, NYS Clean Heat Program, NYS Dept. of Housing and Community Renewal’s Direct Injection Program, and in the Downstate region, the Affordable Multi-Family Energy Efficiency and Multi-Family Energy Efficiency Programs and the New York City Department of Housing Preservation and Development’s Direct Injection Program. Collaboration must continue with the Mayor’s Office of Climate and Environmental Justice, as well as with the NYSERDA Clean Energy Hubs and trusted community-based partners.

We recommend some improvements to coordinating the customer journey, such as having shared region-wide intake and referral protocols, so customers can move smoothly between LMI and non-LMI programs, standardized data sharing between the program administrators, NYSERDA and implementation vendors and using regional planning including leveraging utility capacity maps and integrated planning to support a more geographically targeted electrification and gas system transition planning. We highly suggest that the Staff and Commission review the insights reported in Irrational Labs’ *Behavioral Design Workshop*,¹ which outlines near-universally recognized barriers to retrofit adoption and offers clear recommendations to

¹See Irrational Labs’ *Behavioral Design Workshop* presented for NYSERDA:
https://www.google.com/url?q=https://drive.google.com/file/d/1OyKXnHU_AK5QHxnisSTv1dr_UQNrcGxZ/view?usp%3Ddrive_link&sa=D&source=docs&ust=1762803691365618&usg=AOvVaw3HdtC_KvkksRIOk_sC5re6Q.

support developing better customer journeys in the single-family and multifamily sectors across market segments.

We also recognize the challenges in ensuring adequate contractor capacity and coordination. A universal or regional contractor network/finder across energy efficiency programs would be a useful approach to increase contractor capacity and avoid customer and contractor confusion as it would ensure the same network of contractors are eligible to perform work across NYSERDA, utility, and other agency-administered programs.

Need for Interim Review and Strong Oversight

Both the Upstate and Downstate Plans require large-scale program stand-up between now and 2027, including procurement of implementation vendors, establishing regional intake and processing, expanding contractor networks, and community outreach and trust-building along with coordination with utilities, NYSERDA and regional energy hubs and organizations.

Once programs are underway, we strongly recommend the PSC exercise its oversight capacity to conduct an interim review of these and other EE/BE programs to determine where program funding has been deployed, and whether program funds have been deployed in a way to maximize impact, especially for LMI households and DACs. We recommend that the PSC consider the reporting required under the program Performance Management Framework to inform its review and to direct course corrections where needed. This will ensure that the programs evolve as needed to achieve equitable and efficient delivery.

Conclusion

These regional weatherization programs, if designed and executed with strategic coordination and equity at the center, can become a cornerstone of New York's building decarbonization strategy. By shifting from a "house-by-house" to neighborhood level project deployment, aligning with energy efficiency and electrification incentives and LMI dedicated programs, and establishing clear oversight structures, New York can create a replicable model that delivers affordability, comfort, and climate benefits to communities across the state.

We appreciate the opportunity to provide these comments and stand ready to support ongoing program design, implementation, and stakeholder engagement.

Respectfully submitted,

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