

Statewide Low- to Moderate-Income Portfolio Implementation Plan

Version 4

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Pursuant to New York Public Service Commission Order Adopting
Accelerated Energy Efficiency Targets and
Order Authorizing Utility Energy Efficiency and Building
Electrification Portfolios Through 2025

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Version History and Description of Revisions: New York LMI Portfolio Implementation Plan

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
11/1/2023	4	Consolidation of Introduction and Overview	Prior Executive Summary was consolidated into Introduction and Overview Section.	Section 1
11/1/2023	4	General Updates	Material throughout this Plan has been updated to current status of the Portfolio, including related to current status and future plans for Portfolio initiatives and offerings, Budgets and Benefits information, milestones, BCA, EMV, etc.	Throughout Implementation Plan
11/1/2023	4	Coordination Points	Material in the former subsection on points of coordination among Program Administrators is now addressed in other sections.	Sections 2, 4, 5, and 8
11/1/2023	4	Historical Achievement	Material related to historical achievement in the LMI Portfolio is removed from the Plan as it is addressed in Annual Reports.	Throughout Implementation Plan
11/1/2023	4	Table Presentation of Sections	Former three-part tables describing development process of Portfolio initiatives and elements has been transitioned to narrative description given full implementation status of Portfolio.	Sections 4, 5, and 8.
11/1/2023	4	NE: NY and CEF Interim Review	Context is provided from July 2023 Order Directing Energy Efficiency and Beneficial Electrification Proposals and	Section 1.2

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
			implications for Statewide LMI Portfolio	
11/1/2023	4	Portfolio Objectives and Performance Metrics	Previously separate sections on Portfolio objectives and performance metrics have been consolidated into a single section. Similarly, prior Appendix E has been removed, given that Section 2.4 has been expanded to include the prior Appendix E information.	Section 2.4., prior Appendix E
11/1/2023	4	EmPower+ Launch	This Plan reflects the full launch of EmPower+.	Section 4.1
11/1/2023	4	Multi-year Affordable Housing Partnerships	Material on NYSERDA Multi-Year Affordable Housing Partnerships has been put in its own subsection. This material previously was covered in 4.2.1. Affordable Multifamily Energy Efficiency Programs	Section 4.2.2
11/1/2023	4	RetrofitNY	This Plan reflects the intention to sunset RetrofitNY at the end of 2023.	Section 4.2.4
11/1/2023	4	Multifamily LMI Decarbonization Demonstration Projects	A new section on Multifamily LMI Decarbonization Demonstration Projects has been added.	Section 4.2.5
11/1/2023	4	Launch of Regional Clean Energy Hubs	This Plan reflects the full launch of the Regional Clean Energy Hubs.	Section 5.2
11/1/2023	4	Utility Outreach for EmPower+	Innovative Utility outreach to increase awareness of and participation in EmPower+ has been added as a component in Section 5.3	Section 5.3

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
6/28/2023	3	Budget and Benefits Updates	Corrections to National Grid budgets and benefits for 2023-2025 throughout the document.	Section 3, throughout Implementation Plan, Appendices B-D
5/1/2023	3	Budget and Benefits Updates	Updates to budgets and benefits, including the addition of Appendix B; restated Portfolio and Program Administrator budget and benefit information for historical years; updated budget and benefit projections for future years; additional detail added in Appendix A Table 4; and updates to Program Administrator-specific context regarding budgets and benefits in Appendix C. Update of terms throughout the document from Implementation Plan “targets” to Implementation Plan “benefits.”	Section 3, throughout Implementation Plan, Appendices A-D, H
11/22/2022	3	Budget and Benefit Updates	Updates to budgets and benefits, including restated Portfolio and Program Administrator budgets and benefit information for 2020 and 2021, and updated benefit projections for 2022-2025	Section 3, throughout Implementation Plan, Appendices A-D
11/1/2022	3	Market Conditions	Updated description of market conditions impacting LMI Portfolio, in particular regarding timing and costs.	Executive Summary, Sections 3, 4.1, and 4.2
11/1/2022	3	1-4 Family Program	Updates to 1-4 Family program redesign	Section 4.1

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
			progress and updates to moderate income program project caps.	
11/1/2022	3	Multifamily Program	Updates regarding AMEEP stakeholder engagement webinars	Section 4.2
11/1/2022	3	Federal Funding	Reference to seeking federal funding to support LMI Portfolio, including Inflation Reduction Act.	Section 4.1
11/1/2022	3	VGS Specifications	Updates regarding VGS Specifications, including to address completed evaluation of 1-4 Family program.	Section 8, 1-4 Family and Other LMI Initiatives Specifications
11/1/2022	3	Budgets and Benefits Updates	Updated budget and benefit information, including Program Administrator-specific context regarding budgets and benefits	Executive Summary, Sections 1, 3, Appendices A-D
11/1/2022	3	Milestones	Updates to LMI Portfolio Milestones, including status.	Sections 4.1, 4.2, 4.5, 4.6, Appendix F.
8/15/2022	2	Scorecard Program Mapping to Implementation Plan Statewide Categories	Addition of Appendix G tables, which map individual LMI programs as identified in Program Administrators' quarterly scorecard reporting to Implementation Plan Statewide Categories and Sub-Initiatives	Appendix G
8/15/2022	2	Budget and Benefit Updates	Updates to budgets and benefits, including restated Portfolio and NYSERDA budgets and benefit information for 2020 and 2021, and updated projections for 2022-2025	Section 3, Throughout Implementation Plan, Appendices A-D
5/31/2022	2	Budget and Benefit Updates	Updates to budgets and benefits, including	Section 3, Throughout

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
			restated Portfolio and Program Administrator budgets and benefit information for 2020 and 2021, and updated projections for 2022-2025	Implementation Plan, Appendices A-D
4/29/2022	2	New York policy context for LMI Portfolio	Updates to policy context in New York for LMI Portfolio, including regarding Disadvantaged Communities, the Two Million Homes Action Plan	Throughout Implementation Plan
4/29/2022	2	Achievements since 2020 Implementation Plan	Describes key achievements in advancing Statewide LMI Portfolio since 2020 Implementation Plan	Executive Summary, Throughout Implementation Plan
4/29/2022	2	Coordination Points	Updates on addressing key Coordination Points (data sharing between the Utilities and NYSERDA; Evaluation, Measurement, and Verification; Implementation Contractor procurement; Marketing; and Statewide Application	Section 2.3.1, Throughout Implementation Plan
4/29/2022	2	LMI Joint Management Committee and Executive Council	Update to Joint Management Committee Process, including establishment of LMI JMC Executive Council	Sections 2.4.2, 2.4.2
4/29/2022	2	Stakeholder Engagement	Updated description of Portfolio stakeholder engagement activities	Section 2.4.3, Throughout Implementation Plan
4/29/2022	2	Performance Metrics	Updated information on performance metrics, including status of providing data	Section 2.5, Throughout Implementation Plan

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
4/29/2022	2	Eligibility Criteria	Update of Portfolio Eligibility Criteria, including geographic eligibility	Section 2.6, Throughout Implementation Plan
4/29/2022	2	Budget and Benefit Updates	Updates to budgets and benefits, including (1) to reflect performance since 2020 Implementation Plan; (2) key drivers of cost trends; (3) identification of costs efficiencies achieved and being pursued; (4) updated Portfolio and Program Administrator budgets and benefit information	Section 3, Throughout Implementation Plan, Appendices A-D
4/29/2022	2	1-4 Family Homes Initiatives	Updates include: planning to combine EmPower NY Low-income program and Assisted Home Performance with Energy Star moderate-income program into EmPower+ Program, to be launched in 2023; changes to programs including streamlined EmPower application; coordination between NYSERDA and the Utilities, including data sharing and referrals	
4/29/2022	2	Milestones	Updated current and future milestones for the Portfolio and new appendix mapping 2020 and 2022 Implementation Plan milestones	Sections 4-8, Appendix F.
4/29/2022	2	Existing Affordable Multifamily Buildings	Updates include: development and launch of new statewide Affordable Multifamily Energy Efficiency Program (AMEEP) with	Section 4.2.1

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
			focus on comprehensive measures and projects; transition of prior Program Administrator multifamily programs to AMEEP	
4/29/2022	2	Technical Assistance for Affordable Multifamily Buildings	Updates on NYSERDA FlexTech program, including integration into AMEEP	Section 4.2.2
4/29/2022	2	Template Presentation for Sections	Numerous sections have been reformatted to follow a consistent template	Sections 4.6., 5.1, 5.2, 5.3, 8.
4/29/2022	2	RetrofitNY	Updates include added description and detail on program to advance deep energy retrofits	Section 4.2.3
4/29/2022	2	Affordable New Construction	Updates include added description and detail on NYSERDA affordable new construction initiatives	Section 4.3
4/29/2022	2	Pilots and Demonstrations	Updates include added description and detail regarding NYSERDA LMI pilots and demonstrations	Section 4.4
4/29/2022	2	Beneficial Electrification	Added description and detail regarding pilots, research, and other work to advance the inclusion of heat pump and other beneficial electrification measures in affordable multifamily buildings	Section 4.5
4/29/2022	2	Additional LMI Initiatives	Updates including added description and detail on the New York State Healthy Homes Value-Based Payment Pilot	Section 4.6
4/29/2022	2	Customer Awareness,	Section 5. Customer Awareness, Outreach & Engagement has been	Section 5

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
		Outreach & Engagement	restructured for consistency and clarity	
4/29/2022	2	LMI Portfolio Marketing	Additional information on LMI Portfolio marketing efforts including: statewide branding, the NY Energy advisor website; hard copy customer education collateral and multilingual communications; community based marketing and paid advertising	Section 5.1
4/29/2022	2	Community-Based Outreach and Education	Information and detail on shift in NYSERDA programs from Community Energy Engagement Program (CEEP) to Regional Clean Energy Hubs	Section 5.2
4/29/2022	2	Community Based Customer Engagement	Updated information on: Utility partnerships with LMI community organizations focusing on measure distribution and education; and neighborhood engagement initiatives	Section 5.3
4/29/2022	2	Coordination with External Program Administrators and Other Organizations	Title change to indicate coordination with organizations other than external program administrators; inclusion of Long Island Power Authority	Section 6
4/29/2022	2	Benefit Cost Analysis	Description and results of revised Benefit Cost Analysis for LMI Portfolio	Section 7, Appendix E
4/29/2022	2	Evaluation, Measurement, and Verification (EM&V)	Description of EM&V activities since 2020 Implementation Plan, including development initial and revised Verified	Section 8

Date Filed	Version	Topic	Description of Change	Section/ Page in Implementation Plan
			Gross Savings Specifications; added description on EM&V activity related to assessment of performance metrics	
7/24/2020	1	Not applicable (NA) as first Implementation Plan	NA	NA

1. Introduction and Overview

1.1 Implementation Plan for Statewide LMI Portfolio

The New York Utilities¹ and the New York State Energy Research and Development Authority (“NYSERDA”) (together, “Program Administrators”) jointly file this 2023 Implementation Plan (“Implementation Plan” or “Plan”) for the statewide portfolio of energy efficiency programs and initiatives for low- to moderate-income (“LMI”) customers and communities in New York.² The Program Administrators oversee the portfolio of programs and offerings in this Plan (“the Statewide Portfolio” or the “Portfolio”) in a holistic and coordinated manner to: (1) improve the experience of, and ultimate benefit for, LMI customers seeking to access clean energy services; (2) reduce administrative costs and increase the impact of ratepayer funding; and (3) facilitate a consistent and streamlined experience for both customers and service providers.

The Portfolio of programs outlined in this Plan advances energy affordability and access to energy efficiency for New York’s LMI residents and communities, while supporting New York State’s nation-leading climate policy to transition to carbon-free electricity systems and dramatically reduce greenhouse gas emissions. The Plan contributes to achieving key goals from the Climate Leadership and Community Protection Act³ (“Climate Act”), including the requirement that Disadvantaged Communities (“DACs”)⁴ receive no less than 35% (with a goal of 40%) of the overall benefits of spending on clean energy programs. The Portfolio seeks to achieve this by focusing on the equity issues that can be most directly addressed by clean energy programs, such as energy affordability, reduced fossil fuel combustion to advance environmental justice, and enhanced community engagement. The Statewide LMI Portfolio also supports the Two Million

¹ Central Hudson Gas & Electric Corporation (“Central Hudson”); Consolidated Edison Company of New York, Inc. (“Con Edison”); KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”), The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”), NMPCC Power Corporation d/b/a National Grid (“NMPCC”) (collectively “National Grid”); National Fuel Gas Distribution Corporation (“NFGDC”), New York State Electric & Gas Corporation (“NYSEG”); Orange and Rockland Utilities, Inc. (“Orange & Rockland”); and Rochester Gas and Electric Corporation (“RG&E”), (collectively, “Utilities”).

² This Plan represents an update to prior versions of the Implementation Plan for the Statewide LMI Portfolio, which was first filed in July 2020 (“2020 Implementation Plan” or “2020 Plan”): Case 18-M-0084, In the Matter of a Comprehensive Energy Efficiency Initiative (“NE: NY Proceeding”), Statewide Low- to Moderate-Income Portfolio Implementation Plan (filed July 24, 2020). This Plan generally reflects the same broader context, goals, and approaches that informed and comprised prior versions of the Plan. This Plan supersedes previous versions.

³ Chapter 106 of the Laws of 2019. The Climate Act is available at <https://legislation.nysenate.gov/pdf/bills/2019/S6599>.

⁴ 2019 Climate Leadership and Community Protection Act. <https://legislation.nysenate.gov/pdf/bills/2019/s6599>. The Act defines DACs as “communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high-concentrations of low- and moderate-income households.”

Homes Action Plan to achieve two million climate-friendly homes – one million efficient and electrified homes and one million electrification-ready homes – by 2030, with at least 800,000 of the homes being LMI households.⁵

This Implementation Plan includes a budget of approximately \$1 billion in funding allocations across all of the Program Administrators from 2020-2025, with estimated lifetime electric savings of 9 million megawatt hours (“MWh”), and gas and other delivered fuels savings of 180 million British Thermal Units (“MMBtu”), while serving an estimated 2 million participants.⁶ The Plan is consistent with directives from the New York Public Service Commission (“Commission”), including the Accelerated Efficiency Order⁷ from December 2018 and the 2020 NE: NY Order⁸ from January 2020, which specifies spending 20% of incremental energy efficiency funding on LMI customers with 40% of that spending allocated to affordable multifamily buildings.

The Plan reflects a consistent and accessible program framework whereby the Program Administrators jointly design, implement, maintain, and improve a single Statewide LMI Portfolio of programs. This approach supports enhanced and consistent services and offerings across the state; increased efficiencies and associated cost reductions, including in Portfolio implementation, administration, marketing, and evaluation; and coordinated efforts to continually improve and enhance the Portfolio. LMI customers, contractors, and other market actors and stakeholders benefit from increased alignment of initiatives, incentive structures, marketing, and other Portfolio elements. The Program Administrators file LMI Portfolio Annual Reports which provide information on annual performance of the Portfolio’s activities and achievements under the Portfolio framework.

The Program Administrators work to collaboratively identify, assess, and implement the steps necessary to achieve the vision and associated benefits of the Statewide LMI Portfolio for the period of the Plan, which began in 2020 and continues through 2025. These efforts are coordinated under the LMI Joint Management Committee (JMC)⁹ and

⁵ Governor Hochul Announces Plan to Achieve 2 Million Climate-Friendly Homes by 2030: <https://www.governor.ny.gov/news/governor-hochul-announces-plan-achieve-2-million-climate-friendly-homes-2030#:~:text=Governor%20Kathy%20Hochul%20today%20announced,reaches%20zero%20Demissions%20by%202027.>

⁶ “Annual Participants” includes Customer Awareness, Outreach, and Engagement initiatives (see, Section 5, below) that tend to reach a large number of customers. A detailed breakout by sector is included in Appendix D.

⁷ NE: NY Proceeding, Order Authorizing Accelerated Energy Efficiency Targets (issued December 13, 2018) (“Accelerated Efficiency Order”).

⁸ NE: NY Proceeding, Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios Through 2025 (issued January 16, 2020) (“2020 NE: NY Order”).

⁹ The Order Approving Clean Energy Fund Modifications (“CEF Modifications Order”) issued September 9, 2021, ordered the formation of an Executive Level Council (“Executive Council”) to provide oversight and guidance to the LMI JMC, as applicable.

reflect ongoing engagement with and input from external stakeholders, including but not limited to members of the public, affordability advocates, service providers, and affordable housing agencies.

The Program Administrators acknowledge the Commission’s July 20, 2023 Order Directing Energy Efficiency and Building Electrification Proposals (“EE/BE Proposals Order”), which established important directives related to the Statewide LMI Portfolio.¹⁰ While several substantial changes to the Statewide LMI Portfolio from the EE/ BE Proposals Order take full effect after the current plan period which concludes as of December 31, 2025, the Program Administrators will begin in 2024 to address an optimal transition to the post-2025 LMI Portfolio administrative structure. The Program Administrators will continue to work closely with New York State Department of Public Service (“DPS”) Staff to implement the directives of the EE/BE Proposals Order and any subsequent directives and Commission Orders. Nevertheless, priorities for the LMI Portfolio described in this Implementation Plan include the following:

- pursuing achievement of LMI Portfolio ordered targets, including addressing and resolving target shortfalls;
- assessing, identifying, and implementing LMI program design changes, including the potential to incorporate electrification incentives, such as into the existing AMEEP program structure while maintaining appropriate affordability protections; and
- managing and optimizing overall effectiveness at reaching and serving more LMI customers through multi-pronged efforts to actively engage stakeholders and implement feedback, continuously improve EmPower+ referrals, the NY Energy Advisor website and awareness campaign, and increase outreach through the Regional Clean Energy Hubs and utility outreach partnerships.

1.2 Summary of Plan

Following this Introduction and Overview, the Plan is comprised of the following additional sections:

[Section 2. Statewide LMI Portfolio](#) describes the market, policy, and regulatory context for the Statewide LMI Portfolio, key elements of Portfolio administration including stakeholder engagement, Portfolio Objectives and Performance Metrics, and Portfolio eligibility thresholds.

[Section 3. Budgets, Benefits, and Other Impacts](#) presents the Portfolio budgets and benefits for 2020-2025, both by year and by Program Administrator, as well as Portfolio-

¹⁰ NE: NY Proceeding and Case 14-M-0094, Order Directing Energy Efficiency and Building Electrification Proposals (“EE/ BE Proposals Order”) (Issued July 20, 2023).

level performance metrics by year, with additional detail on budgets, benefits, and metrics provided in the appendices.

[Section 4. Statewide LMI Portfolio Initiatives](#) describes the Portfolio initiatives by sector:

- Existing 1-4 Family Homes
- Existing Affordable Multifamily Buildings
- Affordable New Construction
- Pilots and Demonstrations
- Beneficial Electrification
- Additional LMI Initiatives funded through NYSERDA administered Clean Energy Fund (“CEF”)¹¹, including New York State Healthy Homes Value-Based Payment Pilot

[Section 5. Customer Awareness, Outreach & Engagement](#) describes LMI Portfolio Marketing; Community Based Outreach Education and Engagement Partnerships led by NYSERDA (in particular the Clean Energy Hubs); and Community-Based Customer Engagement and Innovative Engagement Approaches led by the Utilities (collectively or on a utility-specific basis).

[Section 6. Coordination with External Program Administrators and Other Organizations](#) describes additional coordination opportunities (beyond those among the Program Administrators) to work with programs administered by New York State agencies, local government, and community-based organizations to reduce redundancy and to increase synchronization, effectiveness, and overall impact for customers.

[Section 7. Benefit Cost Analysis](#) presents the summary results of the updated Benefit Cost Analysis (“BCA”) for the Statewide LMI Portfolio of initiatives, with additional detail provided in [Appendix E](#).

[Section 8. Evaluation, Measurement, & Verification Approach](#) describes the coordinated approach that the Program Administrators take in estimating savings and evaluating LMI initiatives and provides a summary of updated Verified Gross Savings (“VGS”) Specifications, which are filed along with this Plan.

2. Statewide LMI Portfolio

The Implementation Plan reflects the statewide portfolio of energy efficiency programs for LMI customers that allows the Program Administrators to address energy affordability in a holistic, coordinated manner.

¹¹ CEF Proceeding, Order Authorizing the Clean Energy Fund Framework (issued January 21, 2016).

The Statewide LMI Portfolio aligns LMI investments that NYSERDA makes through the Clean Energy Fund (CEF) and investments that the Utilities make under the 2020 NE: NY Order and the Accelerated Efficiency Order. Through 2025, the Program Administrators have committed approximately \$1 billion¹² in clean energy investments through the Statewide LMI Portfolio. Beyond the Portfolio, NYSERDA and the Utilities are advancing initiatives that benefit DACs through the CEF and the Utility System Energy Efficiency Plans (“SEEP”), including initiatives that contribute to the reduction of fossil-fuel combustion in facilities located in Environmental Justice (“EJ”)¹³ areas and DACs, workforce training and development focusing on priority populations, and improving access to solar for LMI or DACs and affordable housing.¹⁴

2.1 LMI Market Segment in New York

New York State’s LMI customer market is broad and diverse, with more than 3.5 million households (40% of the State’s households) qualifying as LMI.¹⁵ Low-income households, which comprise about 2.3 million households in the state, are defined as those with annual incomes at or below 60% of the State Median Income. Moderate-income households, which comprise about 1.2 million households in the state, are defined as those with annual incomes between 60% and 80% of the State Median Income or the Area Median Income (whichever is greater).

LMI households spend a disproportionate share of their annual income on energy bills¹⁶ relative to other households in New York. In addition, LMI households often lack the time, financial resources, and information necessary to invest in or gain access to energy efficiency upgrades. LMI residents and communities also face challenges associated with quality-of-life issues, including health impacts associated with inefficient and

¹² \$653.5 million in funding from the CEF and \$355.6 million in Utility funding.

¹³ Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. <https://www.dec.ny.gov/public/333.html>

¹⁴ Through the CEF, NYSERDA is investing \$108 million to provide access to workforce training and development opportunities, with a focus on priority populations including residents of LMI communities and underrepresented populations including formerly incarcerated, single parents, homeless individuals and disconnected youths. In June 2020, NYSERDA filed the 2020-2025 Operating Plan for NY-Sun, which outlines \$200 million of investments to increase access to solar for LMI households, disadvantaged and EJ communities, and affordable housing. In April 2022, the Commission approved the 10 Gigawatt Framework for Distributed Solar, which includes investments in rooftop and community solar for low-income and disadvantaged communities. Beyond workforce development and LMI programs, the utilities and NYSERDA administer programs that provide incentives to improve energy efficiency and reduce fossil fuel combustion in commercial, industrial, and institutional buildings.

¹⁵ 2019 American Community Survey: <https://www.census.gov/programs-surveys/acs>

¹⁶ According to 2020 Home Energy Affordability Gap data prepared by Fisher, Sheehan, and Colton and published in April 2021, energy burdens can exceed 30% of annual income for many low-income New Yorkers compared to 6% or less for higher-income New Yorkers: <http://www.homeenergyaffordabilitygap.com/>

deteriorating building stock due to lack of resources for regular maintenance and improvement.

Affordable housing providers, community organizations, and other market actors associated with affordable housing activities face similar obstacles. For instance, affordable housing owners and developers may lack the capital to invest in high-performance or clean energy improvements to their buildings. They also may not have access to resources and the technical expertise necessary to develop solutions for addressing the energy affordability issues faced by their residents.

More than 40% of New York's LMI population lives in affordable multifamily housing exceeding five or more units per building.¹⁷ Those who rent apartments in these buildings often do not have the ability to make their own energy efficiency upgrades, and those who own apartments are often restricted from making improvements by complex cooperative or condominium rules. Decisions to undertake energy efficiency investments in these circumstances often reflect a "split incentive" problem. For example, in buildings where tenants pay their own energy bills, there is little incentive for building owners to undertake such investments. Likewise, tenants who are likely to move in the near term have no incentive to pursue such investments as they would not be able to reap the benefits over time.

The Statewide LMI Portfolio described in this Plan is intended to address the barriers that LMI customers can face in realizing the benefits of energy efficiency. These barriers faced by customers and challenges that the Program Administrators seek to overcome include:

- Limited LMI customer access to capital and financing;
- Limited awareness of energy efficiency programs and resources;
- Split incentives for affordable housing owners to make investments that improve tenant space;
- Administrative challenges in identifying and reaching LMI customers;
- Health and safety or structural deficiencies that impede progress on energy efficiency work; and
- Limited technical and engineering assistance for building owners.

DACs, which the Climate Act defines as "communities that bear burdens of negative public health effects, environmental pollution, impacts of climate change, and possess certain socioeconomic criteria, or comprise high-concentrations of low- and moderate-

¹⁷ NYSERDA Low- to Moderate-Income Market Characterization Report <https://www.nyserda.ny.gov/-/media/Files/Publications/PPSER/Program-Evaluation/2017ContractorReports/LMI-Market-Characterization---Full-Report.pdf>

income households” also face greater challenges to accessing clean energy solutions.¹⁸ Through the Statewide LMI Portfolio, the Program Administrators aim to increase access to energy efficiency and other clean energy solutions through direct investment in programs that can reduce energy burden for residents and communities, increase participation in eligible programs, and expand awareness of available resources and assistance. These solutions include offering home energy retrofits, improving the energy performance and overall quality of affordable housing, and increasing energy awareness¹⁹ among and engagement with residents and communities. The challenges that DACs face are complex and, in some cases, broader than can be addressed through the Statewide LMI Portfolio alone. The Program Administrators continue to coordinate with State, local, and community-based organizations to identify opportunities for improving the impact of the Portfolio in DACs.

2.2 Policy and Regulatory Landscape

The Statewide LMI Portfolio contributes to the advancement of the goals laid out in various New York State energy and climate policy initiatives including, the Affordability Policy,²⁰ New Efficiency: New York (“NE: NY”), the Clean Energy Fund, and the Climate Act.

The Affordability Policy, which seeks to address energy affordability for low-income households, provides direct bill relief in the form of utility bill discounts for low-income customers, totaling approximately \$200 million in FY 2023-2024. The Affordability Policy works in concert with the suite of clean energy programs discussed in this Implementation Plan to improve energy affordability for low-income New Yorkers.

The NYSERDA-administered CEF, instituted in 2016, seeks to improve energy affordability and access to clean energy for LMI households. In compliance with the 2020 NE: NY Order, all CEF investments in LMI households are incorporated into this Implementation Plan to provide a holistic view of all energy efficiency, building electrification, and renewable energy initiatives serving LMI households.

Signed into law in July 2019, the Climate Act outlines an ambitious climate and equity agenda for New York State, including requirements for investing resources to benefit DACs, and for the PSC to create programs to benefit the LMI customer market segment,

¹⁸ Chapter 106 of the Laws of 2019. The Climate Act is available at <https://legislation.nysenate.gov/pdf/bills/2019/S6599>.

¹⁹ For the purposes of this Plan, “energy awareness” refers to awareness of home energy consumption and options for reducing home energy burden.

²⁰ Case 14-M-0565, *Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers* (“Affordability Policy Proceeding”), Order Adopting Low Income Program Modification and Directing Utility Filings, (issued May 20, 2016). In the Affordability Policy Proceeding, the Public Service Commission developed a regulatory policy framework for addressing the energy affordability needs of low-income customers and established an energy burden target of 6% for all low-income customers.

as well as mechanisms to track the adoption of clean energy solutions for these customers and communities.²¹ New York has made significant progress in implementing the Climate Act, including the publication of the Final Scoping Plan, which serves as an initial framework for how the State will reduce greenhouse gas emissions and achieve net-zero emissions, increase renewable energy use, and ensure all communities equitably benefit in the clean energy transition. The Program Administrators seek to align with and incorporate requirements related to the Climate Act, including directing clean energy program spending and benefits to DACs in accordance with the finalized DAC criteria, and support the recommendations in the Final Scoping Plan, as part of the implementation of the Statewide LMI Portfolio.

In addition to the energy and environmental policies that shape this Portfolio, New York State also has an ambitious agenda to advance the affordability and sustainability of housing across the state. In 2022, Governor Hochul announced the Two Million Homes Action Plan, a plan to achieve Two Million Climate-Friendly Homes – 1 million electrified, 1 million electrification-ready, and a minimum of 800,000 serving LMI households – by 2030.²² In furtherance of this goal and advancing energy and housing affordability, New York’s FY2023 Executive Budget adopted Governor Hochul’s proposed \$25 billion 5-year plan for NYS HCR to create or preserve 100,000 units of affordable housing, including a new \$250 Million building electrification fund. In addition, in 2017, the City of New York advanced the Housing New York 2.0 plan, with goals to build or preserve 300,000 homes.²³ Further, in 2021, New York City passed a landmark law to phase out combustion of fossil fuels in new construction by 2027.²⁴ Affordable housing agencies have embraced a leadership role in developing and preserving affordable housing that is also highly efficient and electrified, which in turn can provide important co-benefits such as improved health outcomes and comfort of tenants and reduced operating costs for building owners.

2.3 Statewide LMI Portfolio and Program Administration

The Program Administrators leverage their respective strengths in implementing the Statewide LMI Portfolio. The blending of the statewide reach and market development components of NYSEERDA’s CEF with existing Utility resource acquisition and customer relationship expertise, as well as increased LMI funding, enables the Portfolio to better address the barriers and challenges to expanding the reach of energy efficiency initiatives across the LMI customer market segment holistically. [Section 4](#) of this Plan, Statewide

²¹ Chapter 106 of the Laws of 2019. The Climate Act is available at <https://legislation.nysenate.gov/pdf/bills/2019/S6599>.

²² <https://www.governor.ny.gov/news/governor-hochul-announces-plan-achieve-2-million-climate-friendly-homes-2030>

²³ <https://www1.nyc.gov/assets/hpd/downloads/pdfs/about/housing-new-york-2-0.pdf>.

²⁴ <https://www1.nyc.gov/office-of-the-mayor/news/852-21/mayor-de-blasio-signs-landmark-bill-ban-combustion-fossil-fuels-new-buildings>

LMI Portfolio Initiatives, provides more detail about the working relationship among the Program Administrators.

The development and calibration of the Statewide LMI Portfolio is informed through various inputs, including program performance and market insight from stakeholders, and is overseen by the LMI JMC. Stakeholder engagement is a critical element to the success of the Statewide LMI Portfolio, and the Program Administrators use multiple avenues for engaging with stakeholders to receive feedback on current programs and identify opportunities for future initiatives.

2.3.1 LMI Joint Management Committee

As described in the Statewide Low- to Moderate-Income Joint Management Committee Manual,²⁵ the LMI JMC provides a forum for the Program Administrators to jointly develop and coordinate new market offerings and assess and refine ongoing programmatic activity, in accordance with the Implementation Plan. The LMI JMC consists of representatives from each of the Utilities and NYSERDA, including a lead representative from each organization who serves as the point of contact for Committee-related communications and administrative matters. The DPS Staff provides an oversight and consultative role for the JMC.

2.3.2 Stakeholder Engagement

The effectiveness of the Portfolio largely depends on how well the initiatives and services function for customers and communities. Residents, communities, service providers, and other stakeholders provide beneficial insight that may otherwise not be readily and universally apparent. In combination with EM&V activities and Performance Metrics results, stakeholder engagement and feedback contribute to providing the Committee with a holistic view of the Statewide LMI Portfolio. This wider view allows for improvement efforts and adjustments in alignment with market conditions. To inform the continued development and evolution of the Statewide LMI Portfolio and the ongoing operations of programs, the Program Administrators seek regular opportunities to engage with market partners and communities.

The Committee conducts two stakeholder engagement input sessions per year to review initiatives and services and Portfolio performance and discuss input with stakeholders comprised of staff from Community Based Organizations (“CBOs”), government, utilities, and other market partners. In addition, the Program Administrators conduct focused discussions with stakeholders through one-on-one and small group discussions to obtain input on proposed initiatives and services.

Details on each of the two annual stakeholder input engagement sessions, including meeting logistics, presentations, and a summary document reflecting key issues

²⁵ NE: NY Proceeding, “Statewide Low- to Moderate-Income Joint Management Committee Manual, Version 2” (Filed December 22, 2021).

discussed, questions and answers received, and responses given during each stakeholder input engagement session are posted on the DPS Document and Matter Management website (“DMM”).²⁶ Further, materials are posted on the LMI Stakeholder Resources webpage, which was specifically designed to give stakeholders easy access to documents related to stakeholder engagement.²⁷

At LMI JMC meetings and applicable working groups, the Program Administrators regularly share, discuss, and integrate stakeholder input. Further, the Program Administrators are regularly engaging with stakeholders through the administration of current programs; feedback received during such engagement is raised and discussed at the LMI JMC and/or appropriate working groups. Annual Reports provide additional detail on stakeholder engagement each year.²⁸

2.3.3 Data Sharing Among the Program Administrators²⁹

The efficient sharing of data between the Utilities and NYSERDA is an important component of achieving the goals and objectives described in the Implementation Plan. Such sharing must, however, balance the improved customer experience and streamlined administration of programs, with the need for diligence in rules, processes, and systems that protect customer privacy and security consistent with Commission and Program Administrator policies, laws, and regulations. The Program Administrators developed the following approach:

- Identify the data sharing needs for the Portfolio to streamline customer access to all eligible programs and minimize administrative friction;
- Develop a comprehensive understanding of the existing data sharing framework in place;

²⁶ See, e.g., NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio Stakeholder Webinar June 22, 2023 - Summary Report, (filed August 9, 2023)

²⁷ See, <https://www.nysERDA.ny.gov/All-Programs/Low-to-moderate-Income-Programs/LMI-Stakeholder-Resources-New-Efficiency-New-York>.

²⁸ See, e.g., 2022 Annual Report, Section 4.

²⁹ In prior Statewide LMI Implementation Plans, Annual Reports, and a 2020 Coordination Plan filing, the Program Administrators noted several complex coordination and administration elements that needed to be addressed in the development and implementation of the Portfolio. The Program Administrators filed a Statewide Low- to Moderate-Income Joint Management Committee Coordination Plan (“Coordination Plan”) on November 13, 2020, which detailed progress on and plans for addressing these topics; the Program Administrators provided additional updates on the topics in the 2020, 2021, 2022 Annual Reports. NE: NY Proceeding, “Statewide Low- to Moderate-Income Joint Management Committee Coordination Plan” (Filed November 13, 2020). NE: NY Proceeding, 2020 Annual Report (filed April 1, 2021), pp. 6-8; 2021 Annual Report (filed April 1, 2022), pp., 12-16. Two of the topics, marketing and EM&V, are now addressed in Sections 5 and 8 of this Plan, respectively. Topics related to implementation contractor (“Implementation Contractor”) procurement and statewide application are reflected in applicable subsections of Section 4. Statewide LMI Portfolio Initiatives, in particular Sections 4.1 Existing 1-4 Family Homes and Section 4.2 Existing Multifamily Buildings. The topics of Data Sharing Among the Program Administrators and Implementation Contractor Models and Procurement are addressed as Sections 2.3.3 and 2.3.4, respectively, of this Plan.

- Determine whether any gaps exist between data needs for the Portfolio and the existing data sharing framework; and
- Identify and implement solutions to address any gaps that are identified.

The Portfolio reflects numerous instances of data sharing, including in EmPower+ and AMEEP, which are reflected in Sections 4.1 and 4.2, and which is described in prior Implementation Plans and Annual Reports. In addition, the Program Administrators have agreed upon consent language across programs, which customers sign to participate, to enable ongoing sharing of customer data so that a customer only need to provide their information once to gain access to a range of programs for which they are eligible.³⁰ In 2024 and beyond, the Program Administrators will develop a method for sharing AMEEP program data as well as Portfolio level data among themselves to track program and Portfolio performance and identify areas for improvement. As the Portfolio evolves, the Program Administrators will continue to assess data sharing needs, including identifying any additional high-impact data-sharing use cases to prioritize in 2024 and beyond.

2.3.4 Implementation Contractor Models and Procurement

The Program Administrators recognize the central function of Implementation Contractors in the Portfolio, noting that a more integrated set of initiatives between the Utilities and NYSERDA provides the potential to assess the role of Implementation Contractors to achieve economies of scale and reduce overall administrative costs within the Statewide LMI Portfolio.³¹

Based on an assessment of alternative Implementation Contractor structures, the Program Administrators use two Implementation Contractors for AMEEP, one covering Con Edison, Central Hudson, Orange & Rockland and National Grid’s KEDLI and KEDNY service territories, and one covering NFGDC, NYSEG, RG&E, and National Grid’s NMPC service territory.³²

For 1-4 Family Homes programs, a single Implementation Contractor model is used to deliver the LMI 1-4 Family Homes residential programs Statewide. NYSERDA administers the programs for most of the state, including municipal electric territories, where supplemental energy efficiency incentive funding is provided through the RGGI Annual

³⁰ NE: NY Proceeding and CEF Proceeding, “Standard Customer Consent Language,” (September 5, 2023)

³¹ NE: NY Proceeding and CEF Proceeding, Statewide Low- to Moderate-Income Joint Management Committee Coordination Plan (filed November 13, 2020). The Coordination Plan identified and discussed a range of possible topics and solutions, including contracting timelines, Implementation Contractor functions, cost issues, and streamlining of different Implementation Contractor models among Program Administrators.

³² See, NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio 2021 Annual Report (“2021 Annual Report”) (filed April 1, 2022), p. 15, which describes the assessment process the Program Administrators used in selecting this Implementation Contractor structure.

Operating Plan,³³ with implementation support provided by a third-party Implementation Contractor. In areas of the state where electric service is not provided by one of the Utilities, close coordination is occurring between the relevant electric providers (*i.e.*, on Long Island, and between NYSEDA and National Grid for the Home Energy Affordability Team (“HEAT”) Program).

2.3.5 Implementation Plan Revisions

In accordance with the 2020 NE: NY Order and informal DPS guidance, the Implementation Plan is jointly updated and filed annually or when substantive modifications to the Portfolio are made based on Portfolio performance, input from stakeholders, and discussion among the LMI JMC. Additionally, the Program Administrators file a Statewide LMI Program Annual Report detailing the Portfolio’s performance through the previous calendar year, any substantive findings, and planned areas for future improvement.³⁴

2.4 Statewide LMI Portfolio Objectives and Performance Metrics

Reflecting a list of broad and wide-reaching objectives for the Portfolio from the Accelerated Efficiency Order,³⁵ the Program Administrators have established clear objectives for the Portfolio, which can be effectively measured and assessed by the Program Administrators, the Commission, and other stakeholders, including through the tracking of Performance Metrics, which are described below. Specifically, the Portfolio establishes the following key objectives:

- Achieve savings goals within budget;
- Increase the number of customers served annually;
- Encourage customer adoption of comprehensive efficiency projects;
- Encourage new affordable housing to adopt more energy efficient profiles;
- Increase LMI customer and affordable housing owner awareness of the Portfolio’s energy efficiency programs and offerings;
- Achieve high customer satisfaction;
- Improve energy affordability for LMI customers; and
- Increase administrative efficiencies.

The Program Administrators will continue to measure the success of the Statewide LMI Portfolio in meeting objectives identified above by tracking the Performance Metrics shown in [Table 1](#). Performance Metrics are foundational to assessing the Statewide LMI Portfolio's success and identifying areas for improvement. The Performance Metrics

³³ RGGI Meeting and Planning Documents website <https://www.nyserda.ny.gov/Researchers-and-Policymakers/Regional-Greenhouse-Gas-Initiative/Useful-Documents>

³⁴ NE: NY Proceeding, “Statewide Low- to Moderate-Income Joint Management Committee Coordination Plan” (Filed November 13, 2020). NE: NY Proceeding, 2022 Annual Report (filed April 1, 2023).

³⁵ NE: NY Proceeding, Accelerated Efficiency Order, p. 53.

provide a roadmap for future Portfolio evaluation, guiding the investigation of and informing the basis for measuring performance. The objectives and corresponding Performance Metrics will be reviewed on a periodic basis and updated as appropriate to reflect Portfolio maturity. The list of objectives in Table 1 are not the only key objectives of this Portfolio but have been identified as those that should be tracked to report performance. The Program Administrators track and report the Performance Metrics related to savings and spending in Table 1 quarterly for the Clean Energy Dashboard (“CED”) ³⁶, as well as each Annual Report. The Program Administrators will be looking to set plans for and report on these remaining metrics (*i.e.*, related to customer experience and efficiencies), in the future as well. The Program Administrators survey stakeholders and customers periodically to gauge their awareness of and satisfaction with the program offerings over time. The third column in this table, “Status,” addresses the current ability of the Program Administrators to assess each of the Performance Metrics.

Table 1: Portfolio Objectives and Performance Metrics

Portfolio Objective	Performance Metrics	Status
Portfolio Savings & Spend		
Achieve Portfolio-wide savings goals within budget	MWh annual and lifetime savings achievements	Currently provided in CED and Annual Report
	MMBtu annual and lifetime savings achievements	Currently provided in CED and Annual Report
	CO ₂ e Emission Reduction (metric tons) annual and lifetime savings achievements	Currently provided in CED and Annual Report
	Budget spent	Currently provided in CED and Annual Report
Portfolio Participation		
Increase the number of customers served annually	Number of participants ³⁷ served	Currently provided in Annual Report

³⁶ See, <https://rev.ny.gov/cleanenergydashboard>

³⁷ For the purposes of this Plan, starting in 2022, “participant” is defined as dwelling units served in statewide programs. Dwelling units that receive both electric and gas measures are counted in both the electric and gas category by utility but will only be counted once at the state level. This approach is consistent with past LMI Implementation Plans, though it is noted that the 2022 LMI Annual Report reported participants in alignment with Clean Energy Dashboard scorecards, which count participants in both electric and gas categories, where applicable. The LMI JMC is working towards resolving the reporting methodology for participant counts between future Implementation Plan and Annual Report filings. Prior to 2022, the definition of participants depended on the initiative type, and may have referred to households, multifamily buildings, tenants, and/or accounts.

Portfolio Objective	Performance Metrics	Status
Adopt comprehensive ³⁸ efficiency projects	Energy savings acquired from comprehensive projects	Currently provided in Annual Report
Portfolio Customer Experience		
Increase customer Portfolio awareness	Percentage of LMI customers that learn about Portfolio initiatives from various sources (<i>e.g.</i> , NY Energy Advisor website, Utility or NYSERDA outreach materials, contractors, etc.)	Program Administrators, including EM&V teams, are currently discussing approaches for assessing, including survey instruments, to be coordinated with evaluation contractors
Achieve high customer satisfaction	Participation satisfaction rating	
Advance energy affordability for LMI customers	Participant bill savings, annual and lifetime	Currently provided in Annual Report
Portfolio Efficiencies		
Increase efficiencies of Portfolio investments ³⁹	Cost associated with all Portfolio investments	Currently provided in Annual Report comparing year over year spend and unit costs (\$/MMBtu); addressed in BCA assessment.

2.5 Eligibility Thresholds

For the purposes of establishing categorical eligibility and creating consistency in the market where possible, the income thresholds used to determine eligibility for LMI initiatives are aligned with other state and federal energy and housing programs. The definition of “low-income” is a household income that is at or below 60% of the State Median Income and is consistent with income eligibility criteria used by the Home Energy Assistance Program (“HEAP”)⁴⁰ and the Weatherization Assistance Program (“WAP”). This establishes the receipt of HEAP or WAP as an income eligibility proxy rather than relying

³⁸ NE: NY Proceeding, Accelerated Efficiency Order, p. 36. The Accelerated Efficiency Order states “Comprehensive programs that combine lower cost-effective measures with higher cost-effective measures can optimize the total reduction that can be attained through a single customer transaction. Further, comprehensive building efficiency improvements often result in the installation of measures with longer effective useful lives (EUL), resulting in savings that persist well into the future.”

³⁹ Such efficiencies are described in [Section 3](#), and may apply to categories including, but not limited to, administration, implementation, marketing, incentives, and EM&V.

⁴⁰ Federal Low-Income HEAP regulations establish the maximum income level allowed at 150% of the poverty level, except where 60% of SMI is higher. New York State has adopted the higher of 60% SMI or 150% Federal Poverty Level as the maximum income level allowed. Information on HEAP to be found at: <https://otda.ny.gov/programs/heap/>.

on determinations from NYSERDA and the Utilities. The definition of “moderate-income” is a household income that is below 80% of the Area Median Income or State Median Income, whichever is greater, and aligns with federal Housing and Urban Development (“HUD”) definitions for eligibility for affordable housing.

To establish categorical eligibility for affordable multifamily initiatives, affordable housing is defined as buildings that have regulatory agreements with a housing agency or in which at least 25% of the units are, or are expected to be, occupied by households earning not more than 80% of Area Median Income or State Median Income, whichever is greater.⁴¹

Where categorical eligibility cannot be established for programs, income screening may be conducted on an individual customer or building basis. Consistent with the 2020 NE: NY Order, the Utilities and NYSERDA will continue to develop necessary processes and agreements for NYSERDA to conduct income verification for participation in LMI initiatives, where necessary. In addition to applying traditional income eligibility criteria, the Program Administrators will continue to incorporate alternate methods of determining eligibility for programs, such as geographic eligibility, census-tract, demographic or other means of categorical eligibility.⁴² This is expected to become increasingly important as the state seeks to invest more in DACs per the Climate Act, and as Program Administrators seek more community-based and streamlined ways of delivering services.

With the launch of the combined program application, the EmPower program was able to add geographic eligibility as a method of determining program eligibility. Working with a subset of data used to inform draft DAC criteria development, the program identified census tracts where 50% or more of the residents were at or below 150% of the federal poverty line. All the residents of these areas are categorically eligible for EmPower and are not required to provide income documentation. Since the launch of this feature 14% of the applications to the program have come from these communities. Adding this method of determining program eligibility helps to reduce administrative costs, increase the number of customers served and improves customers’ experience accessing the program. The Program Administrators will look to adopt the final DAC criteria, upon its approval, as a means to increase participation by residents of DACs.

⁴¹ Buildings that do not pay into the System Benefits Charge are not eligible for services through the Statewide LMI Portfolio of initiatives. However, NYSERDA administers Regional Greenhouse Gas Initiative (RGGI) funding, which can be used in some cases to fund projects located in municipal utility territory. The Program Administrators will coordinate with PSEG-Long Island to coordinate where necessary to ensure consistency in program offerings for income-eligible customers across the state.

⁴² Examples include customer participation in housing or social service programs.

3. Budgets, Benefits, and Other Impacts

The Statewide LMI Portfolio consolidates the initiatives and associated budgets and benefits of the CEF and the Utilities. The 2020 NE: NY Order and Accelerated Efficiency Order combined approved a minimum of approximately \$308.3 million in statewide Utility incremental budgets for LMI gas and electric programs through 2025. As defined below, an additional \$48 million in other utility funding will be allocated to this Portfolio. Through the CEF, NYSERDA is incorporating \$653.5 million into the Portfolio to fund LMI clean energy initiatives over the same time period.^{43, 44} Combined, the Statewide LMI Portfolio should by the end the current NE: NY Order period have invested approximately \$1 billion in LMI clean energy initiatives, with total annual savings benefits of 10,286,375 MMBtu and 505,676 MWh.⁴⁵ Additionally, in their Long Island territory (KEDLI), National Grid is investing additional funding approved in their recent rate case⁴⁶ to support the HEAT program. Furthermore, NFGDC's pre-existing LMI funding and performance targets that were approved in its February 2019 Energy Efficiency Transition Implementation Plan/System Energy Efficiency Plan ("ETIP/SEEP") filing to support its Low Income Usage Reduction Program ("LIURP") are also incorporated into the present Statewide LMI Portfolio and will continue to be included in Statewide LMI Portfolio in the future.⁴⁷ In addition, Orange & Rockland plans to transfer additional non-LMI NE: NY funds into the LMI Portfolio to support Existing 1-4 Family Homes initiatives in 2024 and 2025. Initiatives funded through the Portfolio include a combination of statewide initiatives, initiatives tailored to local needs, coordinated outreach and education, and market development⁴⁸ activities.

⁴³ The \$653.5 million in CEF funding builds on the \$255 million that was already committed in the LMI Chapter of the CEF in 2020, which outlined the investments that have been made to advance energy affordability and access to clean energy solutions through the CEF. With the filing of the 2020 Implementation Plan, NYSERDA closed out the LMI Chapter of the CEF and included all future investments in clean energy in the LMI market segment in this Implementation Plan.

⁴⁴ Some NYSERDA investments have longer project timelines than through 2025, such as incentives for affordable new construction. While all funding will be committed by 2025, it may require an additional 5 years for all funds to be expended. This dynamic is reflected in budget and benefit tables in this Plan.

⁴⁵ Includes NYSERDA indirect annual savings, which are reported as plans in this Implementation Plan.

⁴⁶ Case 19-G-0310 et al – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulation of KeySpan Gas East Corporation d/b/a National Grid for Gas Service, *Order Approving Joint Proposal, as Modified, and Imposing Additional Requirements (issued August 12, 2021)*, p. 164.

⁴⁷ See [Appendix A Table 4](#).

⁴⁸As part of the Portfolio, the Program Administrators fund activities intended to increase market uptake of energy efficiency solutions by providing technical assistance to building owners, builders, developers, and housing agencies, and conducting pilots and demonstrations to test and validate new technologies and approaches for delivering energy efficiency services in the LMI market segment.

The budgets and savings benefits presented below reflect revisions to projections from the 2020 and 2022 Plans⁴⁹ based on updated information and analysis regarding the estimated costs and savings for the statewide LMI initiatives. For several Program Administrators in particular, the projected savings benefits described in this Plan differ materially from the targets set forth in the 2020 Implementation Plan and the 2020 NE: NY Order, with the result being an increase or decrease in the projected savings.⁵⁰

A key factor behind this difference is that the budgets and benefits from the 2020 Implementation Plan, and the budgets and targets from the Accelerated Efficiency Order (issued December 2018) and the 2020 NE: NY Order (issued January 2020) were based on historic data (which predated those documents). Generally, the historic data that underpins the ordered budgets and savings targets contained more projects that were completed at lower costs, with less effort and in shorter time spans than is expected to be seen in the future from this Portfolio, which is comprised of programs that encourage deeper and more comprehensive projects.

The Program Administrators note a greater discrepancy between the 2020 NE: NY Order and 2022 Plan run rates for the 1-4 Family Programs as compared to multifamily programs. Accordingly, the impact on utility savings is most pronounced for those utilities whose budget allocations lean most toward the 1-4 Family Homes sector, as opposed to multifamily. Similarly, utility gas programs show a greater discrepancy in run rates in current performance and future projections as compared to the 2020 NE: NY Order and 2020 Plan.

The Program Administrators remain committed to achieving cost efficiencies in the Portfolio. The Program Administrators will continue to assess actual cost data to project future budgets and benefits as accurately as possible. The need to identify and achieve cost efficiencies and accurately project impact in service of increasing the impact of ratepayer investments and reaching more LMI customers with the benefits of energy efficiency further underscores the importance of the Program Administrators efficiently working together under the LMI JMC structure.

Program Administrator detail is included prior to the Program Administrator-specific budget and benefits tables in [Appendix C](#). In summary:

⁴⁹ NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio Implementation Plan, Version 2 (filed April 29, 2022), First Update (filed May 31, 2022), Second Update (filed August 15, 2022), Third Update (filed November 1, 2023), Fourth Update (filed November 22, 2023), Fifth Update (filed May 1, 2023), and Sixth Update (filed June 28, 2023).

⁵⁰ Ordered amounts include additional rate case funds and savings benefits from NFGDC and National Grid (KEDLI).

Benefits

- Projected achievement of ordered electric Utility Program Administrator savings targets varies from overachievement, to alignment, to underachievement relative to 2020 NE: NY Order and the 2020 Implementation Plan.
- NYSERDA projection regarding electric benefits is aligned; NYSERDA projection regarding gas benefits is aligned.

Budgets:

- The Existing 1-4 Family Homes and Existing Affordable Multifamily Buildings Initiatives represent the bulk of the Statewide LMI Portfolio budget. 33% of the total statewide Portfolio budget, including CEF investment, is allocated to Existing 1-4 Family Homes initiatives. 50% of the total Portfolio budget, including CEF investment, is allocated to Existing Affordable Multifamily initiatives.
- Generally, utilities plan to spend or nearly spend their total ordered electric and gas budgets through 2025 and may shift funds between commodities and years to optimize the ability to achieve ordered targets.
- NYSERDA's funding is on a fuel neutral basis and aligns with the 2020 NE: NY Order and subsequent LMI Implementation Plan budgets. Some Program Administrators plan to allocate funds beyond the LMI funds authorized in the 2020 NE: NY Order, either from unspent funds from a prior year (within the NE: NY timeframe) from market rate energy efficiency programs, or from funding approved in Program Administrators' rate cases.

3.1 Portfolio-Level Budgets

This section addresses the Program Administrators' plans to fund the Statewide LMI Portfolio through 2025.^{51, 52, 53} The full breakdown of budget elements by market segment and Program Administrator is included in [Appendix C](#).

⁵¹ NYSERDA budgets are based on electric collections, and are presented in the electric budget table, however the funds are administered on a fuel neutral basis.

⁵² Expenditures in years 2026-2030 reflect projected NYSERDA investments that have longer project timelines, such as incentives for affordable new construction, as noted above. While all funding will be committed by 2025, it may require an additional 5 years for all funds to be expended.

⁵³ Budgets and benefits presented in this Implementation Plan for 2020-2022 represent actual budget spend and achievements in those years.

Table 2: Portfolio Electric Budgets (\$000)

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Central Hudson	-	-	88	157	267	399						910
Con Edison	6,373	3,740	5,643	5,877	6,386	6,184						34,203
National Grid (NMPC)	-	-	996	1,840	2,753	3,310						8,900
NYSEG	880	495	1,219	2,221	2,123	2,903						9,840
Orange & Rockland	-	-	1,155	921	723	723						3,522
RG&E	504	382	668	1,153	1,027	1,331						5,064
NYSERDA	63,959	87,334	105,277	59,582	67,675	84,618	78,154	56,928	36,244	10,979	2,785	653,535
Total	71,716	91,950	115,046	71,751	80,955	99,468	78,154	56,928	36,244	10,979	2,785	715,974

Table 3: Portfolio Natural Gas Budgets (\$000)

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Central Hudson	-	-	239	406	664	815						2,124
Con Edison	5,001	14,781	24,298	33,204	33,764	32,430						143,478
NFGDC	4,563	3,906	9,013	7,043	6,919	7,051						38,496
National Grid (KEDLI)	1,559	1,410	3,922	9,036	7,065	7,108						30,101
National Grid (KEDNY)	-	-	1,579	5,472	7,431	9,915						24,396
National Grid (NMPC)	-	-	1,360	1,926	7,096	10,384						20,767
NYSEG	78	785	1,436	4,373	4,954	6,773						18,399
Orange & Rockland	-	-	2,682	760	1,385	1,385						6,212
RG&E	52	525	865	2,284	2,397	3,106						9,229
Total	11,254	21,408	45,394	64,505	71,675	78,966						293,202

3.2 Portfolio-Level Benefits

This section outlines the Utilities' and NYSERDA's Portfolio savings benefits from 2020-2025.^{54, 55, 56} The savings benefits reflect actual and planned achievements based on available budgets. Timelines of projected benefits may slightly shift year to year within the broader goal of meeting the total MWh and MMBtu ordered targets by 2025. The full breakdown of benefits by market segment and Program Administrator is included in [Appendix C](#).

⁵⁴ Planned and historical achievement throughout this Implementation Plan is reported in accordance with October 2023 Utility System Energy Efficiency Plans and NYSERDA's November 2023 Compiled Investment Plan unless otherwise noted.

⁵⁵ NYSERDA indirect savings are reported as plans throughout this Implementation Plan.

⁵⁶ While NYSERDA does not administer natural gas budgets, NYSERDA does project MMBtu savings due to the fuel neutral nature of the CEF funds. MMBtu savings from fuels other than natural gas are presented below in Table 5.1.

Table 4: Portfolio Electric Targets (Annual MWh)

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Central Hudson	-	-	655	139	205	316						1,314
Con Edison	38,530	13,148	14,765	16,078	12,031	12,383						106,935
National Grid (NMPC)	-	-	7,985	2,652	4,526	4,523						19,686
NYSEG	1,436	399	7,911	7,219	3,605	4,928						25,498
Orange & Rockland	-	-	1,314	1,531	1,361	1,360						5,566
RG&E	976	428	4,057	4,100	2,262	2,930						14,753
NYSERDA (direct)	7,520	19,280	19,104	7,506	14,113	23,389	26,024	39,991	18,480	12,049	3,429	190,885
NYSERDA (indirect)	96	31,935	2,535	5,395	5,573	6,586	10,209	10,590	13,851	13,451	40,818	141,038
Total	48,558	65,190	58,325	44,619	43,676	56,415	36,233	50,581	32,332	25,500	44,247	505,676

Table 5: Portfolio Natural Gas Targets (Annual MMBtu)

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Central Hudson	-	-	642	772	2,033	2,556						6,003
Con Edison	94,724	202,540	247,185	206,449	212,108	213,133						1,176,138
NFGDC	31,411	22,093	47,420	54,457	59,053	64,393						278,827
National Grid (KEDLI)	3,549	7,749	20,233	31,923	25,583	27,812						116,848
National Grid (KEDNY)	-	-	5,740	59,262	70,915	89,955						225,872
National Grid (NMPC)	-	-	2,924	6,995	31,339	53,204						94,462
NYSEG	888	3,612	9,212	26,300	25,287	34,570						99,869
Orange & Rockland	-	-	2,688	4,608	3,637	3,637						14,570
RG&E	969	2,143	6,559	15,800	13,190	17,092						55,753
NYSERDA (direct)	169,677	248,270	256,733	223,413	261,857	339,992	383,936	836,716	461,748	269,616	30,179	3,482,138
NYSERDA (indirect)	2,560	283,441	47,016	132,549	167,095	198,045	265,737	248,313	303,264	267,592	978,830	2,894,441
Total	303,778	769,847	646,351	762,529	872,096	1,044,389	649,673	1,085,029	765,012	537,208	1,009,009	8,444,922

Table 5.1: Portfolio Other Fuels Targets (Annual MMBtu)

Program Administrator	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
NYSERDA (direct)	55,084	76,459	112,249	65,424	31,297	116,367	136,905	268,889	166,094	38,760	1,036	1,068,564
NYSERDA (indirect)	640	-	10,051	38,119	46,756	54,696	84,878	80,522	94,260	85,342	277,625	772,889
Total	55,724	76,459	122,300	103,543	78,053	171,063	221,784	349,412	260,353	124,102	278,661	1,841,453

3.3 Portfolio-Level Impacts

Table 6 provides a collective view on Portfolio-level metrics that are quantified and reported quarterly and can be viewed on the Clean Energy Dashboard. The Portfolio-level performance metrics are actual and planned achievements based on annual budgets and benefits.⁵⁷ A breakdown of performance metrics by sector is included in [Appendix D](#).^{58, 59, 60}

Table 6: Portfolio-Level Performance Metrics

Performance Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Direct Annual MMBtu Savings	356,302	562,865	711,584	695,403	736,299	962,711	520,841	1,105,605	627,841	308,376	31,215	6,619,045
Direct Lifetime MMBtu Savings	7,450,831	11,951,142	14,792,987	11,922,201	12,648,721	16,457,417	8,716,817	17,621,280	10,344,752	5,212,070	780,375	117,898,593
Indirect Annual MMBtu Savings	3,200	283,441	57,067	170,668	213,850	252,741	350,615	328,835	397,524	352,935	1,256,454	3,667,330
Indirect Lifetime MMBtu Savings	64,000	7,086,024	943,493	2,201,813	2,849,543	3,455,408	5,090,823	4,877,921	6,464,950	5,583,700	23,555,722	62,173,396
Direct Annual MWh Savings	48,462	33,255	55,790	39,224	38,103	49,829	26,024	39,991	18,480	12,049	3,429	364,637
Direct Lifetime MWh Savings	696,597	520,446	864,756	591,775	614,406	823,144	502,179	746,048	440,487	292,595	85,725	6,178,158
Indirect Annual MWh Savings	96	31,935	2,535	5,395	5,573	6,586	10,209	10,590	13,851	13,451	40,818	141,038
Indirect Lifetime MWh Savings	1,344	798,374	53,810	87,486	90,156	107,090	160,662	172,712	227,727	234,844	629,455	2,563,661
Leveraged Funds (\$000)	42,145	76,112	105,676	62,789	399,907	389,591	345,490	418,506	19,857	11,429	6,000	1,877,502
Annual Participants	520,353	97,865	362,690	314,481	344,560	333,324	16,036	8,531	5,775	3,453	964	2,008,032

⁵⁷ MMBtu savings include NYSERDA savings from fuels other than electric and gas.

⁵⁸ Leveraged funds are defined as the direct private investment from incentives and service initiatives which includes co-funding of pilots or projects at specific locations, including hard costs for efficiency/renewable/distributed generation, hard costs for metering and monitoring equipment like EMS/BMS, and soft costs of systems that occur during the time frame of program administrator engagement on the pilot or project.

⁵⁹ “Annual Participants” includes Customer Awareness, Outreach, and Engagement initiatives (see, [Section 5](#), below) that tend to reach a large number of customers. A detailed breakout by sector is included in [Appendix D](#).

⁶⁰ The definition of “participant” was standardized to “dwelling unit” for statewide programs starting in 2022.

3.4 Budgets for Affordable Multifamily Buildings

The Accelerated Efficiency Order directed that at a minimum, 40% of the collective incremental LMI funding be committed to serving affordable multifamily buildings.⁶¹ As outlined in this plan, 63% of incremental energy efficiency budgets and 50% of total Portfolio budgets have been allocated to the affordable multifamily market segment. Budget flexibility across the Portfolio will need to be maintained to cumulatively meet the 40% threshold. [Appendix A](#) outlines the investments by sector and the percentage of incremental funding and of all funding that is planned to be spent on affordable multifamily initiatives.

4. Statewide LMI Portfolio Initiatives

The following sections provide an overview of the initiatives and investments that the Program Administrators are undertaking to address the barriers to adoption and increase access to energy efficiency solutions across the LMI market segment.⁶² The Portfolio includes initiatives serving existing 1-4 family homes, existing affordable multifamily buildings, affordable new construction, beneficial electrification, as well as funding for customer engagement and pilots with new approaches for adoption of energy efficiency for LMI residents and communities.

4.1 Existing 1-4 Family Homes

To improve overall energy affordability for LMI households living in 1-4 family homes, the Program Administrators provide no-cost or subsidized energy efficiency upgrades and energy education for both renters and homeowners through the EmPower+ program. In July 2023 NYSERDA combined the program that had served low-income homeowners, EmPower New York, with the program that served moderate income homeowners, Assisted Home Performance, to form one new program EmPower+. Low-income households are eligible for no-cost energy efficiency improvements, while moderate-income households are eligible for incentives of 50% of the cost of the energy efficiency upgrades. Those customers may also be eligible for no-cost energy audits and for low-cost financing of energy upgrades through the Green Jobs – Green New York (“GJGNY”) Program. National Grid administers the EmPower Replacement Program in their Long Island territory, marketed under the brand name “Home Energy Affordability Team” (HEAT) program. It is designed to closely align with the EmPower+ program. The HEAT

⁶¹ NE: NY Proceeding, Accelerated Efficiency Order, p. 55.

⁶² The annual budgets, benefits and performance metrics for initiatives described in Section 4 are included in Appendices C and D.

program provides gas energy efficiency and health, safety and resiliency measures to customers.

The EmPower+ program is administered statewide in close coordination with PSEG-LI and the WAP, HEAP, and local housing programs to optimize the deployment of clean energy investments in the program.

The EmPower+ program administers funding from multiple sources including CEF, NE: NY, RGGI, HEAP, State and Federal funds to increase the reach of the program across the state.

Leveraging the previous statewide 1-4 Family Homes framework of EmPower NY and AHP to reach more households and achieve economies of scale, the EmPower+ redesign includes:

- Improved identification and referral of customers by utilities
- Improved customer referral and enrollment by utilities
- Direct install for moderate-income households
- Alignment of measures, documentation, and processes
- Geographic eligibility for DACs
- Support for community campaigns and other approaches to aggregate demand for energy upgrades and reduce per-home costs

EmPower+ provides a streamlined single unified application for both low- and moderate-income customers that is available both online and paper application that includes geographic eligibility for certain low-income areas. Links to the EmPower+ program pages can be found on the NY Energy Advisor website.⁶³

Agreements between NYSERDA and the Utilities enable the Utilities to provide supplemental funding to the EmPower+ program to increase participation in each service territory.

EmPower+ is a unified LMI program that uses a single set of workflows to create easier access for customers, one access point for contractors seeking incentives, and a thoughtful staged transition plan to lead the state towards beneficial electrification. The combined LMI program is designed to create cost efficiencies through reduced administrative costs and encourage increased customer participation.

In 2024, NYSERDA anticipates administering 2022 Inflation Reduction Act (IRA) funding through EmPower+ to braid existing funding resources, reach more customers, and maximize the impact of rate-payer dollars. NYSERDA will provide an update once the IRA rules are finalized, anticipated in early 2024.

⁶³ <https://energyadvisor.ny.gov/>

In 2022, the HEAT program expanded program eligibility to moderate income customers and is testing a tiered incentive structure design with an ultimate goal of providing learning and insights to Empower+ program and informing its moderate income offering potential redesign.

Utilities will continue to prioritize the enrollment of low-income households with high energy consumption into the EmPower+ program to help reduce energy use and deliver long-term energy burden relief. The Utilities are working closely with NYSERDA to improve the handling of referrals of customers to the EmPower+ Program to increase customer participation and lower acquisition costs. To support awareness of and participation in EmPower+, the Utilities, in coordination with NYSERDA, continue to pursue innovative outreach efforts, implemented consistently across Utilities or individually by utility, and complemented by sharing lessons learned and best practices (see Section 5.3 for additional detail).

Objectives:

- Reduce energy consumption and provide more sustainable energy burden relief for income-eligible households through in-home energy education and energy efficiency improvements
- Identify and address energy-related health and safety issues in homes
- Expand the impact and reach of energy efficiency investments through program coordination
- Engage and educate LMI customers on available programs and improve access to the benefits of clean energy
- Coordination to improve the referral of low-income households with high energy consumption to reduce energy burden and improve customer conversion rate
- Continue shifting toward decarbonization, in alignment with the Climate Act, through a stepwise approach to beneficial electrification and phase-out of fossil fuel use for home heating and hot water, starting with those use cases where electrification will provide both decarbonization and affordability benefits for the customer
- Improve coordination with other programs (e.g., HEAP and WAP)

Technical Details

<p>Market Segment Addressed</p>	<p>Low-income homeowners and renters in 1-4 family homes who meet income eligibility thresholds.</p> <p>In instances where a tenant in a multifamily building is referred for program services, the tenant will be eligible for electrical reduction measures. The building owner will also be encouraged to conduct a more comprehensive upgrade of the building.</p>
<p>Delivery Method</p>	<p>EmPower+ is delivered through a network of approximately 200 weatherization and home performance contractors across New York State, except for Long Island, where HEAT is delivered through several home performance contractor partners.</p> <p>Low-income households may be directly referred into EmPower+ or HEAT by Utilities, community-based organizations, human service providers, and local government.</p> <p>Where possible, low-income projects will be coordinated with WAP by participating contractors that are also WAP subgrantees.</p> <p>Outreach for LMI households will be conducted through statewide and local marketing efforts, the NY Energy Advisor website’s marketing campaign, community-based partners, and participating contractors.</p>
<p>Eligible Measures</p>	<ul style="list-style-type: none"> • Comprehensive home audit • In-home energy education • Building shell improvements (<i>i.e.</i>, insulation, blower-door assisted air sealing, weather stripping) • Electric load reduction (<i>e.g.</i>, refrigerator, freezer, high-efficiency lighting) • Heating, Ventilation, and Air Conditioning (“HVAC”) and mechanical system repairs, tune-ups and replacements. • Domestic Hot Water (“DHW”) improvements and replacements • Controls • Minor health and safety improvements (<i>i.e.</i>, gas leak repairs, smoke and carbon monoxide (“CO”) detectors, combustion safety, venting) • Low-flow water devices <p><i>The HEAT program does not provide any electric saving measures as it is a gas only program but coordinates closely with PSEG-LI’s LMI program.</i></p>
<p>Incentive Structure</p>	<p>Low-income (statewide other than for HEAT program): 100% subsidy for all measures up to project cap as outlined in the program guidelines.⁶⁴ The</p>

⁶⁴ <https://www.nyserda.ny.gov/All-Programs/EmPower-New-York>

	<p>HEAT program also pays 100% subsidy for all measures and aims to review projects and utilize other funding resources once they exceed project cap.</p> <p>Moderate-income: currently customers statewide, other than the HEAT program, are eligible for a 50% subsidy up to program caps on eligible measures/work scopes. KEDLI HEAT offers all moderate-income customers a no cost home energy assessment and direct install measures with a 75% subsidy for customers within 61-70% AMI, a 50% subsidy for customers within 71-80% AMI, and a 25% subsidy for customers within 81-99% AMI.</p> <p>The Program Administrators, in consultation with stakeholders, customers, and contractors, have been asked to consider a more graduated incentives scale for the EmPower+ program. NYSERDA’s implementation of the IRA Home Energy Rebate programs will provide an opportunity to test the viability and cost associated with expanded LMI income eligibility thresholds LMI customers may be eligible for incentives according to a graduated incentive scale, based on household income, with modifications to project cost caps. For all income-eligible customers, direct install services will be provided. The HEAT program will continue to test its tiered Moderate Income incentives structure for the remainder of CY2023 and CY2024, will synthesize lessons learned and continuously evaluate its merit.</p>
Key Partners	<ul style="list-style-type: none"> ● NYS Office of Temporary and Disability Assistance – coordinate outreach and funding to HEAP recipients to reduce utility bills ● NYS HCR - Combined project with WAP subgrantees and coordinate beneficial electrification strategies for 1-4 family homes. ● Departments of Social Services- perform outreach and application intake ● Community-based organizations- Coordinate outreach, disaster response, program design ● NYS Office for the Aging
Additional Funding	<p>In addition to CEF and NE: NY funds, NYSERDA also incorporates funding from RGGI, HEAP, NY State, as well as federal funding, where available, to increase the number of households served.</p> <p>NFGDC will bring in additional LMI funding from their SEEP portfolio to support this program.</p> <p>National Grid (KEDLI) may bring in additional funding if approved in their most recent ongoing rate case for the HEAT program.</p>
GJGNY	<p>No-cost energy audits and low-interest financing are made available under the provisions of the Green Jobs – Green NY Act of 2009. The Program Administrators will coordinate the availability of these services with program incentives to provide customers with the ability to enhance energy upgrades available through the program.</p>

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none"> • Launch the combined, streamlined LMI program- EmPower+ • Increase DAC access to EmPower+ by incorporating DAC geographic eligibility 	Complete
	<ul style="list-style-type: none"> • Outline and seek input on a plan to phase out support for fossil fuel fired equipment in GJGNY audits, financing, and LMI programs to align with Climate Act while preserving energy affordability 	In Progress
2024	<ul style="list-style-type: none"> • Evaluate program performance and optimize design to serve more homes and encourage more contractors to offer efficiency and electrification services through the program • Increase contractor base and expand offerings to meet increased climate goals • Identify ways to enhance or add measures to the existing EmPower offerings, particularly for gas savings • Increase awareness, community outreach and education through coordination between the Clean Energy Hubs and utility outreach programs • Increase DAC access to EmPower+ by coordinating with regional Clean Energy Hubs on targeted outreach to DACs • Pursue opportunities to obtain and incorporate funding from the Inflation Reduction Act into LMI programs 	Planning
2025	<ul style="list-style-type: none"> • Continue to integrate funding from the IRA to increase adoption of beneficial electrification • Prepare for the expansion of EmPower+ in NYC/Long Island area • Integrate a dynamic customer program interface to aid in outreach to LMI homes 	Future

4.2 Existing Affordable Multifamily Buildings

Affordable multifamily housing is a key component of the Statewide LMI Portfolio, as a large proportion of LMI customers in New York State live in multifamily buildings. Improving the performance and sustainability of affordable multifamily housing will benefit DACs, as required by the Climate Act. As directed in the 2020 NE: NY Order, at least 40% of the portfolio’s incremental energy efficiency funds must be directed to affordable multifamily initiatives through 2025.

The Program Administrators manage a set of initiatives to improve the energy efficiency of existing affordable multifamily buildings through both measure-specific and comprehensive upgrades. These efforts, combined with technical assistance, are designed to address the unique challenges and adoption barriers faced by existing

affordable multifamily buildings. The Utilities, NYSERDA, and affordable housing agencies collaborated to conceive of and launch these initiatives with an eye towards leveraging existing programs. For example, NYSERDA's FlexTech program was leveraged to provide technical assistance for the newly launched AMEEP, and expanded to enable deeper decarbonization measures through, for example, NYSERDA providing additional funds and technical assistance for NYC HPD and NYS HCR preservation programs.

The Program Administrators oversee and implement each of the initiatives in this section. Programs are complementary to one another to furnish services for existing affordable multifamily buildings in a holistic manner. To promote comprehensive, whole-building energy upgrades, it is essential that the Program Administrators implement programs to support buildings that undertake multiple upgrades with the necessary tools and resources to understand and apply to the initiative that best suits their needs. This requires close coordination among the Program Administrators.

4.2.1 Affordable Multifamily Energy Efficiency Program

Launched in 2021, the Affordable Multifamily Energy Efficiency Program ("AMEEP") is a Statewide program providing a streamlined customer experience such that existing affordable multifamily building owners, developers, and their representatives have access to financial incentives to facilitate energy efficiency upgrades. A key focus of AMEEP is to encourage comprehensive, whole-building energy retrofits to help participants achieve deeper savings, while taking advantage of opportunities to reduce administrative costs. A common web intake portal directs leads and inquiries. The Utilities use the same customer application and maintain the same requirements and application for the participating contractor network. Buildings that fall in overlapping utility service territories submit one application, work with one utility Implementation Contractor as their main point of contact during the project process, and a single party performs inspections. Streamlining administration of the program in this manner has the potential to promote cost efficiencies. Links to AMEEP program pages can be found on the NY Energy Advisor website,⁶⁵ and the AMEEP application can be found on the Statewide AMEEP documents page.⁶⁶

In addition to coordination among themselves, the Utilities coordinate with NYSERDA to furnish AMEEP participants with technical assistance. Customers can perform a whole-building energy retrofit through AMEEP's "Comprehensive Pathway." This pathway requires that the project work scope be guided by an energy audit, which can be completed through NYSERDA's FlexTech program, as described in [Section 4.2.3](#).

⁶⁵ <https://energyadvisor.ny.gov/>

⁶⁶ <https://www.nysenda.ny.gov/All-Programs/Low-to-moderate-Income-Programs/LMI-Stakeholder-Resources-New-Efficiency-New-York/NYS-Affordable-Multifamily-Energy-Efficiency-Program>

Alternatively, customers may choose to perform single measure upgrades through AMEEP’s “Non-Comprehensive Pathway.” The AMEEP incentive structure is described in more detail in the Technical Details table below.

While the launch of AMEEP reflects full implementation of the statewide framework in service to the existing affordable multifamily sector, the Program Administrators continue to enhance elements of the program. For example, AMEEP and NYS Clean Heat will continue to coordinate to enable complementary incentives between the programs. Further, the Program Administrators continue to refine AMEEP based on sustained operational experience and stakeholder feedback. This includes exploring opportunities to leverage the existing AMEEP program structure to incorporate electrification incentives while containing costs for both residents and buildings owners. To this end, the Program Administrators will continue to work with external agencies, particularly affordable housing agencies serving existing affordable multifamily buildings.

Objectives:

- Address cost barriers experienced by owners of affordable multifamily properties
- Integrate energy efficiency into the regular investment and financing cycle of affordable multifamily properties
- Improve awareness and access to energy efficient solutions for tenants and building owners of affordable housing
- Provide a simplified experience for owners of affordable multifamily properties that are navigating multiple ratepayer-supported programs
- Deliver benefits to tenants, while improving the overall efficiency of the building
- Address the barrier of split incentives between owner and tenant
- Build capacity among housing agencies to incorporate energy efficiency into affordable multifamily buildings

Technical Details

Market Segment Addressed	Affordable multifamily buildings, tenants living in affordable multifamily buildings, affordable multifamily building owners, housing agencies, service providers, participating contractors, and other parties working with affordable multifamily buildings and building owners.
Delivery Method	The Utilities are the AMEEP Administrators, with NYSERDA providing energy audits and market development elements. Energy audits are completed by NYSERDA-approved energy providers in the FlexTech Consultant network and Multifamily Building Solutions Network and are available statewide. Two Implementation Contractors administer AMEEP, one for upstate National Grid, NFGDC, and NYSEG and RG&E, and one for the other Utilities.

	<p>Participating Contractors complete installations of eligible measures. Utilities coordinate in overlapping utility service territories, so that customers work with only one implementation contractor in executing projects. The Program Administrators continue to examine the current state of implementation across the state to identify areas for improvement to reduce administrative inefficiencies, increase enrollment, and promote comprehensive upgrades.</p>
Eligible Measures	<p>Measures include but are not limited to:</p> <ul style="list-style-type: none"> • Lighting • Building envelope • HVAC • Elevator modernization • Variable frequency drive • Blower fan • Circulator pump • Energy management systems • Boiler • Pipe insulation • Water and space heating • Steam traps • Boiler clean and tune • Light emitting diode (“LED”) lighting measures • Faucet aerator • Showerhead
Incentive Structure	<p>AMEEP is designed to maximize energy savings and lower costs to tenants and owners of affordable multifamily buildings by encouraging comprehensive building upgrades while providing project flexibility. AMEEP includes two program pathways: (1) a “Comprehensive Pathway,” which encourages whole-building energy retrofits; and (2) a “Non-Comprehensive Pathway” for customers who are interested in smaller, measure-level upgrades.</p> <p>Incentives for all Comprehensive Pathway projects are calculated using a “points” system, which allocates points to energy efficiency measures based on measure savings and policy objectives and establishes points-achievement tiers that result in increased incentive rates. A minimum of 100 points needs to be met for a project to be classified as a Comprehensive project; a project is designated as Tier 1 – with the corresponding incentive level – if it achieves between 100 and 149 points. If a project reaches 150 or more points, it is categorized as a Tier 2 project and is eligible to receive a greater incentive. Comprehensive incentives are awarded on a dollar per dwelling unit basis. An energy audit is required as part of the Comprehensive Pathway to help identify the scope of work, and incentives are available to offset the cost of the audit through the FlexTech Program.</p>

	<p>Customers opting for the Non-Comprehensive Pathway are able to perform measure-level energy efficiency upgrades. They may select to complete prescriptive and custom measures and can participate in the in-unit direct install program, without undergoing an energy audit. Incentives in this pathway are awarded on a dollar per equipment or dollar per savings basis.</p>
Key Partners	<p>NYSERDA and Con Edison have worked with NYS HCR and NYC HPD to offer complementary strategies to the market. This coordination will continue.</p> <p>Con Edison maintains consistent engagement with the NYC Mayor’s Office of Climate and Environmental Justice (specifically, the NYC Accelerator staff) to coordinate key energy efficiency topics and current program delivery methods.</p> <p>The Program Administrators will continue to work directly with housing agencies to incorporate funding into preservation projects to offset incremental costs associated with higher performance.</p> <p>Con Edison is working with their local Public Housing Authorities (<i>i.e.</i>, New York City Housing Authority (“NYCHA”), Westchester County Housing Authority (“WCHA”)) that are not covered under the System Benefit Charge (“SBC”) to provide incentives for gas energy efficiency programs.</p> <p>The Program Administrators engage regularly with AMEEP participating contractors and other stakeholders via quarterly Participating Contractor and Industry Partner (“PC&IP”) webinars. The webinar series is designed for the Program Administrators to present upcoming changes to the AMEEP Program Manual and for participating contractors and industry partners to share feedback or ask questions related to the program. Additionally, in 2023, the Program Administrators held an AMEEP Roundtable Discussion to solicit feedback from key stakeholders regarding AMEEP design and operations.</p>

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none"> Organize stakeholder interviews on AMEEP design and operations based on the first full year of operation to get feedback to guide analysis and potential program changes, and adapt program eligibility to reflect final DAC criteria⁶⁷ 	Complete

⁶⁷ An AMEEP Roundtable was held in August 2023 and was geared towards collecting operational feedback on the program. Incorporating DAC criteria is an ongoing, future consideration.

2024	<ul style="list-style-type: none"> Study creation of measure packages for comprehensive retrofits by building typology based on data from AMEEP participants, and assess ability to offer packages as part of AMEEP 	In Progress
	<ul style="list-style-type: none"> Review program objectives and operations to enable alignment with potential policy changes scheduled to take place in 2022 and 2023 (e.g., NE: NY Interim Review, Climate Act definition of providing benefits to DACs) 	Planning

4.2.2 Multi-Year Affordable Housing Partnerships

In 2021, NYSERDA announced the creation of multi-year partnerships with NYS HCR and NYC HPD to integrate decarbonization technical assistance support and incentives directly into regulated affordable housing finance processes, while supporting the development of more aggressive sustainability guidelines, new energy savings underwriting guidelines, and training among housing agency staff to position the agencies as leaders in making efficient, electrified housing their standard practice.

As part of this effort, NYSERDA and NYS HCR announced a transformative partnership called the Clean Energy Initiative (“CEI”), providing CEF funding to support state-of-the-art all-electric affordable homes and streamline access to technical assistance and electrification funding by integrating these resources directly into NYS HCR’s affordable housing finance applications. CEI creates a one-stop process for developers to access technical assistance, direct integration of efficiency and electrification funding, and affordable financing, serving both affordable housing new construction and preservation. Since 2021, NYSERDA has allocated \$32.5M to NYS HCR to disperse to affordable housing finance applicants that implement efficient, all-electric new construction and retrofits. Ultimately, NYSERDA will provide \$100M in funding through 2025 to support NYS HCR in this effort ahead of proposed code changes and mandates.

CEI incentivizes installation of heat pumps for space conditioning and/or domestic hot water production, along with envelope and ventilation improvements to bring those building features beyond New York State Energy Construction Code requirements and towards passive-house level performance.

In a similar effort, NYSERDA partnered with NYC HPD to create the Retrofit Electrification Pilot, which provides \$24M to support space heating and cooling and/or domestic hot water electrification for existing multifamily building rehabilitation projects in NYC HPD’s preservation programs to bring the comfort and health benefits of electrification to

roughly 1,200 LMI households. As with CEI, the Pilot also includes a dedicated Technical Assistance Provider to promote and enable electrification and build capacity among HPD staff and owner & developer teams for implementing decarbonization scopes. The Pilot incentivizes installation of heat pumps for space conditioning and/or domestic hot water production, as well as weatherization measures to enhance the performance of these systems. Weatherization items include enhanced windows, wall and roof insulation, pipe insulation, energy recover ventilation, and air sealing.

In Q3 of 2023, NYSERDA and HPD expanded its partnership to include the Future Housing Initiative (“FHI”), an incentive program for HPD new construction projects. FHI incentivizes projects to achieve passive house performance; specifically, projects are required to install heat pumps for space conditioning and domestic hot water production and envelope and ventilation enhancements to achieve passive house certification.

NYSERDA’s partnerships with HPD and HCR demonstrate scalable models for integrating efficiency and electrification technical assistance and incentives into affordable housing refinancing by giving owners direct access to decarbonization resources and funding as part of their refinancing process.

NYSERDA has also joined forces with the NYCHA – the largest public housing authority in the country and the largest landlord in New York City – and NYPA to create the Clean Heat for All Challenge, a heating and cooling industry competition to create a packaged, cold climate heat pump that can be mounted in a window opening and provide comfortable efficient heating and cooling to NYCHA residents on a room-by-room basis. The partnership leverages RGGI funding and technical assistance from NYSERDA, NYPA’s procurement vehicle and project management, and NYCHA’s portfolio size and funding commitment to invest \$250M in a proven solution to advance their electrification agenda.

To achieve full implementation in its partnerships with the housing agencies, NYSERDA will continue to expand its direct funding partnerships with state and local housing agencies to serve more units with efficiency and electrification and build capacity among housing agencies and affordable housing development community to build or retrofit all-electric efficient buildings at low or no incremental cost; enhance underwriting practices to capture the value of highly efficient, electrified buildings; to reach both new construction and preservation pipelines, and support development of sustainability guidelines that advance the affordability and sustainability goals of Governor Hochul’s 5-

year Affordable Housing Plan, and deliver on the State’s climate goals by requiring high-performance all-electric retrofits by 2027.⁶⁸

Objectives:

- Address cost barriers experienced by owners of affordable multifamily properties
- Integrate energy efficiency into the regular investment and financing cycle of affordable multifamily properties
- Improve awareness and access to energy efficient solutions for tenants and building owners of affordable housing
- Deliver benefits to tenants, while improving the overall efficiency of the building
- Address the barrier of split incentives between owner and tenant
- Build capacity among housing agencies to incorporate energy efficiency into affordable multifamily buildings

Technical Details

Market Segment Addressed	Affordable multifamily buildings, tenants living in affordable multifamily buildings, affordable multifamily building owners, housing agencies, service providers, participating contractors, and other parties working with affordable multifamily buildings and building owners.
Delivery Method	NYSERDA provides funding directly to housing agencies (<i>e.g.</i> , NYS HCR and NYC HPD) to serve affordable housing developers as part of the financing process.
Eligible Measures	Measures include but are not limited to: <ul style="list-style-type: none"> • Lighting • Building envelope • HVAC • Elevator modernization • Variable frequency drive • Blower fan • Circulator pump • Energy management systems • Boiler • Pipe insulation • Water and space heating • Steam traps • Boiler clean and tune • LED lighting measures • Faucet aerator • Showerhead
Incentive Structure	NYSERDA is providing a per-dwelling unit incentive based on package of efficiency and/or electrification measures.

⁶⁸ <https://hcr.ny.gov/sustainability-guidelines>

Key Partners	Housing agencies (e.g., NYS HCR, NYC HPD, Public Housing Authorities), service providers, and other housing intermediaries
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Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none"> • Issue initial small purchase order for and install packaged window heat pumps in NYCHA properties as part of ‘demonstration phase’ of Clean Heat for All initiative • Begin M&V of installed units to measure performance through the heating season • Begin contracting with first cohort of projects selected under the Future Housing Initiative (FHI) new construction pilot program with NYC HPD 	In Progress
2024	<ul style="list-style-type: none"> • Assess viability of packaged window heat pumps as an effective electrification approach/model for NYCHA housing and broader NY multifamily market • Pending success of demonstration phase, initiate broader implementation phase of Clean Heat for All initiative and install additional packaged window heat pumps • Assess the efficacy of the Direct Injection funding approach in promoting electrification and energy efficiency in existing buildings going through the refinancing cycle 	Future

4.2.3 Technical Assistance for Affordable Multifamily Buildings

Increasing the performance of existing affordable multifamily buildings at scale requires support beyond direct incentives for building owners, as technical and information gaps can limit the ability of housing agencies, financiers, and other housing intermediaries to implement energy efficiency upgrades. Technical support, in the form of engineering studies and IPNAs, can help building owners maximize available program incentives to inform capital planning and achieve greater energy savings. This section highlights the various approaches to supporting the adoption of energy efficiency through the provision of technical support and resources to the affordable multifamily ecosystem.

NYSERDA administers the FlexTech program, which offers a cost share model for building owners to receive funding to conduct an energy study on their building. AMEEP projects that require technical assistance to qualify for higher incentives available in the Comprehensive Pathway can satisfy the technical assistance requirement through the

FlexTech program. The audits completed must be Level I+ as defined by the FlexTech Program, or higher (e.g., ASHRAE Level II, IPNA).⁶⁹ Multifamily building owners and their representatives in need of a study can work with their utility point of contact, who will coordinate with NYSERDA to arrange funding for the study. The owner and their representative may select a service provider from NYSERDA's FlexTech or Multifamily Building Solutions network of consultants to perform the audit, and to help in developing a project work scope. NYSERDA oversees workforce development and the training of energy service providers through the FlexTech Consultant Network and the Multifamily Building Solutions Network. NYSERDA provides a cost share for the study at completion of the audit, helping to ease the cost burden on the affordable buildings. Afterwards, the project is executed under the utility-administered incentive program.

Housing agencies often do not have in-house technical capacity or resources to drive increased energy performance of their portfolios, and access to performance data is key to advancing the underwriting of clean energy projects. For this reason, NYSERDA works with housing agencies and financiers to identify gaps in available performance data and invests in the development of data sets that can be used to aid in determinations on underwriting and build confidence among financiers and housing agencies. NYSERDA also provides technical assistance and funding for NYC HPD and NYS HCR preservation programs to drive greater energy performance, build internal capacity, and assist owner teams. Similarly, NYSERDA provides technical assistance to support CEI and the Retrofit Electrification Pilot, as discussed in [Section 4.2.2](#).

Objectives:

- Conduct comprehensive energy audits for existing affordable and market rate multifamily housing utilizing vetted energy service providers
- Subsidize energy audit costs to incentivize market adoption of conducting such audits
- Develop report that covers: the relevant building information (e.g., building's energy usage, annual energy costs by fuel type, rate tariff); evaluated measure findings, which includes but is not limited to a description of what was evaluated, analysis results, proposed conditions, and recommendations and reasons for recommendations; economic analysis of evaluated measures; and additional benefits, such as greenhouse gas reduction, Local Law compliance, and

⁶⁹ See, <https://cdnc-dcxprod2-sitecore.azureedge.net/-/media/files/coned/documents/save-energy-money/rebates-incentives-tax-credits/rebates-incentives-for-multifamily-customers/nys-affordable-building/program-manual.pdf?rev=9a1cad1ee94d44e0b08b48fa75c8ee0c&hash=95B37418F77EEF76652B8886CF5F74B7>

environmental benefits. The report is intended to inform decision makers on how to reduce energy costs and incorporate clean energy into their capital planning.

- Establish a scope of work that would qualify for the comprehensive pathway of AMEEP.
- Conduct assessment of electrification and electrification-ready opportunities.
- Ensure smooth hand-off of projects from NYSERDA Flex Tech program to AMEEP

Technical Details

Market Segment Addressed	Multifamily buildings with 5 or more dwelling units that meet the definition of affordability, where at least 25% of the households are at or below 80% of the State Median Income or Area Median Income, whichever is higher. Additionally, housing agencies (NYC HPD, New York City Housing Development Corporation (“HDC”), NYS HCR), energy service providers that specialize in multifamily housing, tenants living in affordable housing, and other parties working with affordable multifamily buildings and building owners.
Delivery Method	Utilize framework of NYSERDA consultants; coordination with housing agencies to provide necessary support
Eligible Study Areas	<ul style="list-style-type: none"> • Energy efficiency technical analyses • Investigations of an advanced technology or system • Creation of a long-term energy plan • Investigation of deep energy savings • Investigation of Clean Heating and Cooling Systems including Air Source Heat Pumps, Ground Source Heat Pumps, Variable Refrigerant Flow, and Solar Heating and Cooling
Incentive Structure	Cost-share up to 75% of cost of technical assistance services
Key Partners	Housing agencies (e.g., NYS HCR, NYC HPD, Public Housing Authorities), service providers, and other housing intermediaries

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none"> • Provide technical assistance resources to housing agencies to build in-house capacity to assess and support sustainability as part of core mission 	Complete
	<ul style="list-style-type: none"> • Update program eligibility to increase access in disadvantaged communities 	In Progress
2024	<ul style="list-style-type: none"> • Recommend consideration of electrification and/or electrification-readiness as part of any subsidized 	In Progress

	technical assistance to enable long-term building decarbonization efforts	
	<ul style="list-style-type: none"> • Modify technical assistance offerings to increase engagement with disadvantaged communities 	Planning
2025	<ul style="list-style-type: none"> • Plan transition to next iteration of NYSERDA technical assistance programs 	Planning

4.2.4 RetrofitNY⁷⁰

New York State’s existing affordable multifamily buildings offer great potential for energy savings and greenhouse gas emissions reductions. Traditional energy efficiency programs targeted at multifamily buildings typically reduce on-site energy consumption by up to 30%. Greater building performance, on the order of 70% of on-site energy consumption reductions, can be achieved by undertaking a deep energy retrofit, which consists of insulation of the shell, installing HVAC equipment, and lighting, among other upgrades. Despite the significant benefits of conducting deep energy retrofits on multifamily buildings, there are several barriers to scaling deep energy retrofits in the affordable multifamily building market segment. The deep energy retrofits currently being done are complex, not replicable, and are not cost effective.

Since its public launch in 2018, RetrofitNY has identified key barriers to scaling deep energy retrofits in New York State and beyond. Key major barriers include underinvestment, industry fragmentation, high customer acquisition costs, and misallocation of risks. These current market failures drive up costs and hamper rapid decarbonization in the building sector.

Lowering building owner upfront costs will greatly increase adoption rates of deep energy retrofit solutions. Sizing the market opportunity and pricing the value of deep energy retrofits, which includes avoided costs, new sources of revenue, and reduced risk of the retrofit solution is key to reducing upfront capital requirements.

The RetrofitNY, the program has lead or supported the following market interventions to realize an end-state solution and develop a retrofit value chain that is both time and resource efficient:

- Warranty for offsite manufactured whole building retrofit solutions
- Qualify retrofit companies capable of turnkey delivery of replicable solutions
- Marketplace and customer acquisition platform

⁷⁰ RetrofitNY was approved as part of the Clean Energy Fund LMI Chapter, and with the transition to the Statewide LMI Portfolio, is now included in this Implementation Plan.

- Support the development of financial products and market mechanisms that effectively value the outcomes of fully electrified buildings
- Loan loss reserve fund (or first loss reserve) for whole building retrofit solution ecosystem
- Product testing and tech transfer support
- Coordination on R&D investment areas
- Coordination on workforce development initiatives
- Reduce insurance costs for the construction and operation of carbon neutral buildings
- Engagement with investors
- Direct financial support for retrofit projects

Addressing the barriers and market development areas laid out above continues to be critically important. However, NYSERDA is sunsetting the RetrofitNY initiative, effective end of 2023. NYSERDA has gained significant insights from the RetrofitNY initiative and will publish its lessons learned to share with key stakeholders and help inform future program design and implementation to serve the MF LMI sector.

Objectives:

- Develop simplified, scalable solutions for conducting deep energy retrofits in occupied multifamily units
- Ensure that affordable housing is prioritized when it comes to developing solutions for enabling the adoption of building retrofit solutions
- Assist the architecture, engineering, technology, and construction industry in the development of innovative solutions to significantly improve energy performance

Technical Details

Market Segment Addressed	Affordable housing buildings owned by Public Housing Authorities, and privately owned multifamily affordable housing buildings regulated, financed or subsidized by affordable housing agencies or housing finance agencies such as NYS HCR, NYC HPD, the New York State Housing Finance Agency, and HDC. NYSERDA will subsequently expand its target market to other building sectors containing typologies that are a good fit for the solutions developed.
Delivery Method	The administration of RetrofitNY includes: <ul style="list-style-type: none"> • The development of high-level criteria that the architecture, engineering, technology, and construction industry will need to meet to create the retrofit solutions. • Creating the demand side of a new market for deep energy retrofits by aggregating a large number of units that will commit to implement the solutions to be designed.

	<ul style="list-style-type: none"> • Qualifying solution providers, component manufacturers and building owners that would be eligible for demonstration pilots through periodic funding rounds. • Organizing a design-build process to select and test the developed solutions through demonstration pilots. Using lessons learned from funding rounds, NYSERDA will organize subsequent rounds to improve the solutions until they meet all predefined criteria and adapt them to additional building types. To ensure replicability, scale and impact, NYSERDA is analyzing New York’s affordable housing portfolios to identify the most prevalent building typologies in the state. • Facilitating innovative financing by interested private sector lenders to leverage energy and operational savings to provide additional capital to buildings. • Hosting investor groups to bring needed investment to companies with technologies that can drive cost compression of solutions and developing the New York supply chain for high efficiency building components. • Promoting broad adoption of these deep-retrofit solutions as preservation strategies for the affordable housing stock and encourage their adoption across the multifamily housing market.
Key Partners	<ul style="list-style-type: none"> • Public Housing Authorities • NYS Affordable Housing regulatory agencies including NYS HCR and NYC HPD • Housing Finance Agencies including New York State Housing Finance Agency, and HDC • Private building owners • Builders, developers, architects, suppliers, engineers, building scientists, building technology firms and other service providers • Private financing companies, insurance and re-insurance companies, and energy service companies • Department of Energy

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none"> • Close out RetrofitNY program and ensure that projects that have advanced through key stage gates receive support before program is closed 	In Progress
2024	<ul style="list-style-type: none"> • Publish lessons learned and insights from RetrofitNY program 	Future

4.2.5 Multifamily LMI Decarbonization Demonstration Projects

NYSERDA’s Multifamily LMI Decarbonization Demonstration Projects initiative is focused on supporting comprehensive, multi-year decarbonization projects in the LMI MF sector. This initiative will support a limited number of demonstration projects that 1) support upstate comprehensive projects that demonstrate repeatable approaches to phased decarbonization for upstate LMI MF buildings; 2) a limited number of large-building comprehensive energy efficiency and building electrification projects in very large Multifamily buildings, such as Mitchell Lama buildings, in partnership with the affordable housing agencies; 3) test repeatable models for making progress on comprehensive decarbonization for off-cycle retrofits in LMI MF.

Objectives:

- Work in partnership with public and private portfolio owners of Multifamily LMI buildings to develop repeatable strategies for cost-effective decarbonization of existing LMI Multifamily buildings;
- Support partnerships between building owners, consulting engineers, technology providers, financing entities and others to scale cost-effective decarbonization strategies;
- Fund comprehensive projects that demonstrate repeatable pathways for decarbonization of upstate LMI Multifamily buildings;
- Fund comprehensive projects that demonstrate repeatable pathways for decarbonization of very large LMI Multifamily buildings, such as Mitchell Lama buildings;
- Fund comprehensive projects that demonstrate repeatable pathways for “off-cycle” decarbonization of LMI Multifamily buildings (e.g. when buildings are not going through a refinancing process)

Technical Details

Market Segment Addressed	LMI Multifamily statewide
Delivery Method	<ul style="list-style-type: none"> • NYSERDA runs competitive solicitation(s) to develop cohorts of LMI MF project teams. These project teams will include building owners, consulting engineers, technology providers and others. NYSERDA provides funding to selected teams for the development of long term carbon reduction roadmaps as well as their near term retrofit strategies. The selected teams then have the opportunity to submit proposals to a NYSERDA competitive solicitation for the implementation of their retrofit strategies.

Key Partners	<ul style="list-style-type: none"> • Affordable housing agencies • LMI MF portfolio owners • Engineers, architects • Technology providers • Financial entities interested in funding low-income multifamily housing upgrades
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Implementation Milestones (2023-2025)

Year	Milestone	Status
2024	<ul style="list-style-type: none"> • Build first cohort of LMI Multifamily Demonstration partners • Fund first round of LMI Multifamily Demonstration projects 	Future
2025	<ul style="list-style-type: none"> • Build second cohort of LMI Multifamily Demonstration partners • Fund second round of LMI Multifamily Demonstration projects • Publish lessons learned and key insights from LMI Multifamily Demonstration Program 	Future

4.3 Affordable New Construction

High performance and carbon neutral new construction can significantly reduce the energy consumption and related costs in the residential sector than would otherwise be expected, delivering not just energy bill savings for residents and building owners, but also improving the health and comfort of residents and providing resilient and sustainable housing stock that delivers long term energy savings and carbon emission reductions. Despite the many benefits, only a small portion of residential new construction is achieving carbon neutral or net zero energy performance. This can be attributed to several market factors including constraints with current building and design practices, potential for higher incremental costs, and limited availability of performance data and off-the-shelf design and build specifications. There is also a general lack of awareness of the long term financial, health, and environmental benefits associated with these buildings. The Program Administrators recognize current market constraints and will continue to seek to scale the design and construction of new and substantial renovations in the affordable housing market by working with market partners and stakeholders within the new construction and affordable housing sector. This includes the network of housing agencies, builders and developers, architects, engineers, and financiers to address the market barriers associated with building to higher levels of energy efficiency. The Program Administrators have converted their market engagement strategy to deliver incentives and services directly within the public housing agencies, and have reduced other financial incentive opportunities and technical support in the market.

Objectives:

- Improve building performance through reduction of site energy use and electrification of affordable new construction, with the goal of carbon neutral performance
- Support trades and developers to advance engineering, design, construction practices, and performance verification
- Identify and test replicable models for achieving highly energy efficient and carbon neutral performance in new affordable housing
- Advance integrated design solutions that are replicable, with a focus on cost optimization
- Continue to support New York State and New York City housing agencies, funding authorities, and municipalities in their efforts to secure the most efficient, durable, resilient, and healthy housing, based on technical and economic feasibility, while striving to maximize effective use of the resources available to achieve those goals
- Increase information about, awareness of, and demand for deep energy savings and carbon neutral construction for new and gut rehab of single family and multifamily buildings

Overview

NYSERDA administers the Affordable New Construction Housing Program across the State, which provides:

- Technical and financial support to public housing agencies
- Technical assistance to projects seeking to achieve high performance energy efficient buildings
- Incentives to housing developers and builders, with incentive levels based on the performance of the building, for projects already in the standard offer program pipeline
- Quality Assurance (“QA”) services through third parties such as Residential Energy Services Network (“RESNET”)-accredited Rating Quality Assurance Providers, Multifamily Review Organizations (“MRO”), or qualified certifiers/verifiers to one of the Passive House standards
- Recognition for exceptional design of affordable new construction through the Buildings of Excellence competition
- Market development support that includes integrated design and construction protocols, and the development of data and information resources to document success stories and lessons learned that can be used to provide cost/benefit justification.

Technical Details

Market Segment Addressed	Builders, developers, owners, architects, engineers, energy modelers and other construction entities for new affordable single family or multifamily buildings or substantial renovation (in the form of conversion to affordable housing) of existing commercial buildings.
Delivery Method	Incentive support for affordable new construction projects participating in the standard offer programs will continue until projects are completed. New project incentives will be provided primarily via Housing Agencies, in particular via the Clean Energy Initiative, to builders and developers, with some funding awards through the Buildings of Excellence competition also continuing. Technical assistance will be provided to housing agencies, architects, engineers, builders, and developers.
Eligible Measures	The Affordable New Construction initiative assesses the overall performance of the building. For existing pipeline in the standard offer program, envelope, decarbonized HVAC, appliances, and efficient lighting measures are all eligible for inclusion in incentivized projects.
Incentive Structure	For affordable new construction and gut renovation projects currently in the standard offer program pipeline, incentives are provided by NYSERDA based on the level of energy savings achieved, as outlined in the program documents. The Buildings of Excellence competition provides incentives for innovative design and construction of zero carbon emitting multifamily buildings. Housing Agencies are offering Clean Energy Initiative incentives for new construction and renovation projects that meet efficiency and decarbonization performance criteria. Where the Utilities and NYSERDA will be offering incentives, the Program Administrators will coordinate to streamline program participation as necessary and ensure the greatest impact of ratepayer funding.
Key Partners	<p>NYSERDA has developed channel partner relationships with organizations that deliver professional development and educational opportunities to the market to facilitate the dissemination of best practices and cost compression opportunities to builders, developers, energy modelers and consultants.</p> <p>Target audience engagement will continue with key partners including community development corporations (“CDCs”), developers, builders, architects, engineers, housing intermediaries, non-profit builders, and Home Energy Rating System (“HERS”) raters to bring projects to fruition and gather data to develop and disseminate best practice solution sets.</p> <p>NYSERDA is working with NYS HCR and NYC HPD to offer complementary strategies to the market. Via the Clean Energy Initiative and Future Housing Initiative, respectively This coordination will continue.</p> <p>Program Administrators will continue to work directly with housing agencies to incorporate funding into new construction projects to offset incremental costs associated with higher performance.</p>

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none"> • Continue supporting expanded integration with public housing agencies • Launch of Round 4 of the Buildings of Excellence Competition for multifamily building design • Utilize data and successful solution sets from decarbonization projects to deploy information through Channel Partners, conferences and other general awareness activities 	In Progress
2024	<ul style="list-style-type: none"> • Continue supporting expanded integration with public housing agencies • Launch of Round 5 of the Buildings of Excellence Competition for multifamily building design • Utilize data and successful solution sets from decarbonization projects to deploy information through channel partners, conferences, and other general awareness activities 	Future
2025	<ul style="list-style-type: none"> • Continue supporting expanded integration with public housing agencies • Utilize data and successful solution sets from decarbonization projects to deploy information through channel partners, conferences, and other general awareness activities 	Future

4.4 Pilots and Demonstrations⁷¹

Opportunities for increasing access to energy efficiency solutions, beneficial electrification and improving energy affordability are ever-evolving, with new technologies, applications, business and delivery models, and opportunities for cross-sector coordination emerging on a regular basis. To continuously improve the programs and offerings under the Statewide LMI Portfolio, the Program Administrators will continue to incorporate the piloting and demonstration of new technologies and approaches for serving LMI customers and communities.

⁷¹ In general, the sections of this Implementation Plan use a similar template in presenting information. The content in certain sections does not readily conform to this template – notably [Section 4.4 Pilots and Demonstrations](#) and [Section 4.5 Beneficial Electrification in LMI Homes](#); therefore, these sections use a more typical prose presentation.

Through pilot activities, the Program administrators seek to:

1. Identify and test technologies and/or approaches for addressing the barriers to improving energy efficiency and adoption of beneficial electrification in the LMI market segment;
2. Test approaches that can scale the adoption of energy efficiency and beneficial electrification in the LMI market segment;
3. Prove models for improving the delivery of energy efficiency solutions and beneficial electrification across the LMI market segment that can reduce administrative burden for customers and administrators; and
4. Determine innovative approaches for improving awareness and access to energy efficiency solutions and beneficial electrification for DACs.

The Program Administrators fund LMI pilots and demonstrations through the CEF, with the expectation that learnings will be communicated and deployed at a larger scale. For instance, a novel approach for delivering energy efficiency services to customers may require testing before being broadly adopted. Through the CEF, this approach for service delivery can be tested and, if successful, be rolled out for deployment through the Utilities. To identify pilot opportunities, the Program Administrators will continue to leverage existing vehicles for discovering possible pilot concepts, such as REV Connect or through the issuance of solicitations seeking innovative solutions. Decisions on pilot priorities and the sharing of information between Program Administrators will occur within the LMI JMC. In addition, the Program Administrators will report annually on pilot activities, including results and planning.

In 2022, NYSEDA selected an LMI-focused marketplace concept through the Innovative Market Strategies⁷² initiative to pilot, with the intending to test whether a holistic marketplace that combines education on the high-efficiency products, access to low-interest financing, and targeted incentives can provide an effective complement to traditional energy efficiency retrofit programs to advance equitable access to clean energy solutions and lower barriers to adoption of higher efficiency products. The pilot is was launched in Spring 2023. The outcomes of the pilot are anticipated in early 2024.

Ongoing work is continuing to evaluate lessons learned from research, analysis, pilots, and incentive offerings.

4.5 Beneficial Electrification in LMI Homes

Electrification in the LMI sector presents unique challenges and economic and institutional barriers. In markets where natural gas is less expensive than electricity, for

⁷² <https://www.nyserda.ny.gov/All-Programs/Innovative-Market-Strategies-Program>

example, switching from gas-fired boilers or furnaces to heat pumps risks increasing utility bills for LMI customers, who are least equipped to deal with higher living costs. Tenants in rental housing face the potential for additional monthly utility bills should a heat pump retrofit result in shifting costs from heating fuel (typically not paid by tenants) to electricity costs (typically paid by tenants). Heat pumps are still not well integrated into existing benefits programs providing energy-related support to income-qualified households, such as HEAP.

Owners of affordable housing face significant barriers to heat pump retrofits as well. These owners tend to have low capital reserves available for retrofit projects, and other capital needs that are perceived as more urgent. The cost imbalance between gas and electricity threatens the NOI of buildings that convert from gas heat, and results in paltry energy cost savings to offset the upfront investment. Across an entire portfolio, such as that of NYS HCR, higher operating costs can jeopardize financing deals and result in less available capital for housing production and preservation. Furthermore, many owners of affordable housing are restricted in their ability to raise rents, or face other restrictions based on their subsidy deals, adding to the difficulty of recouping an upfront investment in heat pumps.

On the other hand, electrification offers potential health and other benefits to at-risk residents. Heat pumps can provide both heating and cooling services, presenting additional value to homes that previously had limited or no cooling systems. Through reductions in on-site combustion, electrification has been shown to reduce indoor pollutants that exacerbate respiratory illness.

As such, the Statewide LMI Portfolio investments in beneficial electrification in the LMI market segment seek to maintain energy affordability and consumer protections, while providing these benefits and increasing access to clean energy solutions for LMI communities, households, and building owners. These beneficial electrification investments will be used to better understand the LMI market, test strategies to accomplish the aforementioned goals, and support promising solutions to reaching scale.

As articulated in the NYS Clean Heat filing in 2020,⁷³ NYSERDA has allocated \$30 million⁷⁴ of its \$250 million Clean Heating and Cooling Investment Plan for 2020-2025 to market interventions that provide clean heating and cooling solutions to the statewide LMI market segment, in four areas:

- ***Research and analysis:***

- Conduct market studies to inform NYSERDA and other market actors about

⁷³ See, NE: NY Proceeding, NYS Clean Heat: Statewide Heat Pump Program Implementation Plan (filed March 16, 2020 and updated May 29, 2020), Appendix A.

⁷⁴ In addition to the \$30 million investment in beneficial electrification represented here, NYSERDA is investing an additional \$1 million as part of this work under the CEF.

barriers to electrification and ways to mitigate these with targeted solutions and best practices across various building types, as well as strategies to maintain affordability, all of which will inform pilot and demonstration efforts.

- ***Pilots and demonstrations:***

Identify and fund potentially replicable and scalable models for LMI heat pump adoption that reduce known market and institutional barriers in critical LMI segments and provide data and examples that boost investor confidence.

- ***Short-term incentives:***

Provide short-term statewide standard offer incentives that are combinable with other utility and government incentives to promote incorporation of heat pumps into low-income weatherization and affordable housing energy efficiency projects. These incentives will identify approximately 1,500 LMI homes and apartments that have undergone heat pump conversions, from which to collect data and other learnings.

- ***Consumer education:***

Develop educational materials to help homeowners, building owners, and property managers operate and maintain heat pump systems optimally, in order to increase the impact and benefit of the heat pump installation.

In 2024, Program Administrators will continue to coordinate on these efforts to advance beneficial electrification in the LMI market segment, with a particular focus on developing a cohesive framework for how building owners can layer available sources of upfront capital and preserve energy affordability while moving to electrification. This effort will continue to inform long term investments in beneficial electrification for LMI homeowners and tenants in affordable housing. To encourage beneficial electrification in existing affordable multifamily buildings, the Program Administrators have been and will continue in 2024 to explore opportunities to leverage the existing AMEEP program structure to incorporate electrification incentives while containing costs for both residents and buildings owners.

Implementation Milestones (2022-2024)

Year	Milestone	Status
2023	<ul style="list-style-type: none"> • Convene contractors, suppliers, and manufacturers of heat pump solutions to provide insights on current practices and on how the State can expand support for heat pump conversions during emergency no heat situations in 1-4 family homes. • Convene affordable housing and finance stakeholders to gather information and determine an action plan for supporting heat pump adoption with tenant protections in the rent stabilized portfolio of NY’s rental housing market. • Complete market research on and modeling of utility bill impacts of LMI electrification. • Complete market research on programmatic, policy, and regulatory barriers to electrification in LMI multifamily housing. 	In Progress
2024	<ul style="list-style-type: none"> • Publish interim learnings from LMI heat pump demonstration study (short term incentives) • Socialize and begin implementing recommendations to State agencies from earlier market research on lowering programmatic, policy, and regulatory barriers to electrification in LMI multifamily housing. • Partner with sister agencies to develop guidance for affordable multifamily building owners on electrification: pathways to secure state, utility, and federal funding for heat pump projects; and technical, legal, regulatory, and business considerations for altering provision of building services to tenants. • Launch a pilot supporting rapid response heat pump conversions in situations where existing fossil heating systems are at or near failure, for 1-4 family homes. • Launch follow-on research into policy and regulatory initiatives that can enable heat pump adoption in LMI housing • Launch a pilot offering targeting owners of rent stabilized multifamily housing • Publish additional learnings from the LMI heat pump demonstration study (short term incentives) • Revise program rules to incorporate affordability and consumer protections learnings from research and evaluation of real-world projects 	Future

4.6 Other LMI Initiatives

In addition to the Statewide LMI Portfolio initiatives, NYSERDA administers other initiatives to increase access to clean energy solutions and improve energy affordability

for LMI residents and communities as part of the Clean Energy Fund Market Development Portfolio (“CEF Market Development Portfolio”).

4.6.1 New York State Healthy Homes Value-Based Payment Pilot

The New York State Healthy Homes Value-Based Payment (“VBP”) Pilot, a joint effort by NYSERDA and the New York State Department of Health (“DOH”), seeks to develop a framework that allows New York’s managed care organizations (“MCO”) to fund residential healthy homes interventions⁷⁵ as part of their value-based payment arrangements with healthcare providers within the Medicaid Healthcare Delivery System.⁷⁶ By validating impacts such as healthcare cost savings and benefits to residents, and by providing market development support, including specification of services and guidance related to VBP contracting, the Healthy Homes Pilot facilitates the adoption of healthy homes treatments by MCOs as part of their Medicaid VBP Arrangements that incorporate social determinants of health.⁷⁷ Adopting this approach addresses avoidable medical costs associated with respiratory conditions such as asthma and also household injury, while encouraging third-party capital investment in residential energy efficiency through MCO adoption of healthy homes interventions within the VBP social determinants of health framework after the completion of the Pilot.

Approved in 2019, the Pilot is currently in the field, taking place during 2021-2024, with NYSERDA and NYS DOH collaborating to implement healthy homes interventions in 500 Medicaid member homes and jointly evaluating the associated reduction in Medicaid cost savings and benefits for residents. Responsibilities for each agency include:

- NYSERDA

⁷⁵ A residential healthy homes intervention combines energy efficiency and weatherization measures (*e.g.*, insulation and air sealing) with measures that address persistent respiratory health conditions such as asthma (*e.g.*, ventilation, moisture/mold mitigation, carpet removal), and includes additional measures aimed at home injury prevention (smoke and CO alarms, stair repair, electrical outlet covers). When implemented together, these interventions can improve occupant health, reduce energy bills and healthcare costs, and improve the comfort and safety of a home.

⁷⁶ New York State Medicaid has transitioned the managed care healthcare delivery system from a fee-for-service to a VBP model that links healthcare provider performance and reimbursement through a pre-determined set of value metrics. Under the VBP model, MCOs (*i.e.*, healthcare plans such as Empire Blue Cross Blue Shield) enter into arrangements with healthcare providers or provider networks. To support local investment in activities that address social determinants of health (“SDH”), VBP arrangements require incorporation of a CBO engaging in work focused on SDH. Addressing substandard housing as an SDH intervention places energy efficiency and weatherization measures, when incorporated within a healthy homes intervention, within the DOH value-based payment model.

⁷⁷ In New York State, the Medicaid transition to a VBP framework, along with an existing infrastructure to deliver healthy homes services, provides a window of opportunity for healthy homes interventions to be considered a fundable healthcare expense. To aid in the VBP transition, DOH is required to administer pilots in cooperation with MCOs to test VBP models incorporating work addressing social determinants of health such as substandard housing. There is a current network of over 200 energy efficiency contractors in New York State, including more than 50 weatherization sub-grantees, who meet the conditions necessary to provide Medicaid services under VBP Arrangements.

- Funds Pilot activities, advises intervention planning related to energy and housing measures, facilitates and manages energy/housing services included in the Pilot, and assumes responsibility for data collection and evaluation activities related to energy measures/outcomes
- Provides market support intended to prepare the existing network of energy efficiency and residential improvement contractors to implement healthy homes interventions as well as provide guidance related to the VBP SDH contracting process
- NY State Department of Health
 - Office of Health Insurance Programs secures MCO participation in the Pilot and oversees all VBP contracting activities.
 - Office of Public Health advises Pilot intervention planning related to asthma trigger reduction measures and asthma care management services, facilitates and manages direct health services included in the Pilot, and assumes responsibility for data collection and evaluation activities related to health measures/outcomes
 - Center for Environmental Health advises Pilot intervention planning and evaluation activities related to home injury prevention measures

NYSERDA and NYS DOH have modified Pilot parameters and processes to continue to address complications resulting from the COVID-19 pandemic and to facilitate Pilot benefits and learnings and to ensure appropriate stewardship of budgeted funds. Modifications made in 2023 include expanding Pilot eligibility to include Medicaid members who are not currently associated with Pilot VBP arrangements to increase the number of households that can be served and expanding service regions to include counties in Western and Central New York along with all five New York City boroughs. The Pilot schedule and implementation needs are closely monitored and will continue to be adjusted to remain responsive to participant needs and market conditions. The budget and impacts for the NYS Healthy Homes VBP Pilot can be found in [Appendix D](#).

Objectives:

- Develop a framework that allows New York’s MCOs to fund residential healthy homes interventions in partnership with energy/residential improvement contractors as part of their value-based payment arrangements with healthcare providers within the Medicaid Healthcare Delivery System
- Validate healthcare cost savings and benefits to residents—including energy, health, and safety—through evaluation undertaken in partnership with NYS Department of Health
- Support residential market preparedness for incorporation of healthy homes interventions into the Medicaid Healthcare Delivery System standard business

practice, including specification of services and guidance related to VBP contracting

- Encourage third-party capital investment in residential energy efficiency with MCO adoption of healthy homes interventions supportive of addressing social determinants of health through VBP beyond the Pilot

Technical Details

<p>Market Segment Addressed</p>	<ul style="list-style-type: none"> • Managed care organizations (<i>i.e.</i>, health plans) operate within the Medicaid Healthcare Delivery System, contracting with healthcare service providers within the value-based payment framework to provide clinical care and other health-related services to Medicaid members • Energy efficiency/weatherization contractors provide energy efficiency and health and safety services and subcontract for additional environmental trigger reduction services, as needed, in residential dwellings within a given region • Health service provider networks (<i>e.g.</i>, physicians, hospitals, nursing and community health worker agencies) operate within the Medicaid Healthcare Delivery System to provide health services such as clinical care, in-home education, and referrals to community-based resources that address social determinants of health • Residents/customers (<i>i.e.</i>, Pilot participants that are high Medicaid utilizers) follow their clinical care plans and participate as necessary in the coordination of health service and dwelling service interventions
<p>Delivery Method</p>	<ul style="list-style-type: none"> • NYSERDA implements the Pilot in cooperation with the NYS DOH Office of Health Insurance Program, Office of Public Health, and Center for Environmental Health according to the responsibilities outlined in the introduction of Section 4.6.1 • Participating MCOs identify eligible members and conduct outreach to potential participant households • The Pilot intervention’s dwelling-based services are provided by NYSERDA-participating residential contractors qualified through a NYSERDA Request for Qualifications • The Pilot intervention’s health services are provided by community health workers and registered nurses with specialized training who are affiliated with agencies that are partnered with participating MCOs through value-based payment arrangements • Program administration/implementation and technical assistance are provided through existing NYSERDA and DOH program operations infrastructure

Eligible Measures	<p>Full intervention measures include:</p> <ul style="list-style-type: none"> • Residential energy and environmental assessment • Energy efficiency measures (<i>e.g.</i>, envelope improvements, electric load reduction, heating system repair/replacement) • Environmental trigger reduction measures (<i>e.g.</i>, mold remediation, carpet removal, integrated pest management, ventilation) • Household injury prevention measures (<i>e.g.</i>, smoke alarms, carbon monoxide detectors, stair/railing repair, bathtub safety bar installation) • Community health worker support (<i>e.g.</i>, in-home education related to asthma self-management and medication adherence, supportive products, and coordination across providers); skilled nursing referrals, when applicable per health services criteria. • Resident education, guidance regarding community resources, and post-intervention follow-up
Incentive Structure	<ul style="list-style-type: none"> • All intervention services are provided at no cost to a Pilot-participating household. • Intervention dwelling-based services utilize an incentive structure based on existing NYSERDA residential programs (<i>e.g.</i>, EmPower+) • For planning purposes, average cost per project was estimated at approximately \$12,000, with flexibility in per-project cost determined according to scope of work evaluated by program staff • Additional allergen reduction products provided to Pilot participating households are valued at approximately \$250 per household, facilitated through a contract with American Lung Association
Key Partners	<ul style="list-style-type: none"> • NYSERDA has worked closely with the NYS DOH Office of Health Insurance Programs (inclusive of Medicaid), Office of Public Health, and Center for Environmental Health to identify the Pilot opportunity and position it in the most beneficial way for both NYSERDA and DOH. • In coordination with NYS DOH, NYSERDA has engaged with MCO executive staff who expressed interest in incorporating healthy homes interventions into their existing Value-Based Payment Arrangements or entering into new Arrangements based on the need for healthy homes services among their Medicaid members. • NYSERDA engaged representatives of the residential energy efficiency industry—including private contractors and weatherization subgrantees, local housing organizations, community-based organizations, and philanthropy on this specific Pilot opportunity and have received universal support for this Pilot work. • In coordination with New York State Department of Public Service, NYSERDA hosted seven stakeholder forums in 2018 to discuss barriers and opportunities to increase energy efficiency and access to clean energy solutions for LMI residents. The need for health and safety improvements was a primary barrier raised by stakeholders.

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none">Commence interim reporting on Year One intervention implementation process, to be incorporated into Pilot outcomes and evaluation report	In Progress
2024	<ul style="list-style-type: none">Complete draft of the Pilot outcome analysis, to be incorporated into the full Pilot evaluation	Planning

5. Customer Awareness, Outreach & Engagement

Awareness and education initiatives play a crucial role in making energy efficiency and energy affordability programs accessible to LMI customers. Historically, Program Administrators have found it difficult to reach LMI customers. A primary contributor to this dynamic is lack of awareness of incentive programs to promote energy efficiency and clean energy technologies in LMI communities. The success of the Statewide LMI Portfolio depends on a successful customer awareness, outreach, and engagement campaign. To that end, the Program Administrators will continue to design and implement strategies to engage LMI customers and affordable property owners. Additionally, continuing to expand the availability of educational and awareness driving media and content in different languages continues to be a priority.

Customer awareness, outreach and engagement initiatives build on existing program experience and provide a comprehensive and integrated statewide approach. These initiatives seek to:

- Raise Customer Awareness About Portfolio Offerings**

In order for the Portfolio to be successful, LMI customers need to be made aware of the initiatives and services. The Program Administrators recognize the diversity of LMI New Yorkers and are focused on establishing an outreach campaign that is inclusive. This includes use of inclusive messaging and imagery as well as delivery channels that are most likely to reach LMI audiences. To achieve this, community partners will continue to be engaged to assist in raising customer awareness of the benefits of participation. Additionally, since many income-qualified households are unaware of their eligibility for these programs, it will be important to provide broad-based market-wide awareness and outreach to help those residents who may not self-identify as LMI find the appropriate resources for their situation.

- **Motivate Customers to Take Action**

Once customers are made aware of initiatives and services for which they may qualify, the next step is to engage customers in taking action. Messaging has been designed to help customers understand the participation process and benefits of taking action. In certain cases, customers are also more likely to take action if they feel a brand has a positive impact or plays a role in their community. According to the Nielsen Hispanic Report 2023,⁷⁸ the Hispanic audience is 83% more likely to think something is favorable if this is the criteria.

- **Provide Easy Access to Participation**

The initiatives will continue to be designed with ease of customer application and participation in mind. Contractor information is made readily available for those customers seeking assistance after an application is submitted for one or more initiatives.

As part of this effort, the Utilities continue to identify supplemental activities to support LMI initiatives and cross-promote EmPower+ and AMEEP, including distribution activities through food banks and other activities. These activities are described in greater detail in [Section 5.3](#).

The following key initiatives comprise the Statewide LMI Portfolio’s Customer Awareness, Outreach and Engagement approach:

1. LMI Portfolio Marketing

- Statewide branding
- Centralized NY Energy Advisor website and its associated marketing campaign
- Expanded and improved market-wide consumer education landing environment designed to assist users in finding the best incentive programs and offers available to them, in particular, helping all income-eligible consumers find LMI resources like the Energy Advisor and Clean Energy Hubs quickly and easily.
- Branded hard-copy program outreach and informational materials to complement the online NY Energy Advisor website
- Delivery of community-based marketing and paid advertising

2. Community-Based Outreach, Education, and Engagement Partnerships

- An enhanced network of statewide, community-based partners to leverage the customer outreach and engagement capabilities of LMI stakeholder organizations and contractors

⁷⁸ Nielsen “Hispanic audiences in focus: Trust in media – the key factor driving shift to streaming”
<https://www.nielsen.com/wp-content/uploads/sites/2/2023/09/hispanic-report-2023.pdf>

- Community Energy Engagement Program (“CEEP”) and Regional Clean Energy Hubs
3. Community-Based Customer Engagement and Innovative Outreach Initiatives
- Delivery of community-based partnerships that combine distribution of low-cost energy efficiency measures with education about energy efficiency and clean energy and information on how to participate in other Portfolio programs
 - Neighborhood-based delivery model
 - Innovative outreach approaches that leverage Utility engagement channels.

This comprehensive approach will continue to allow the Program Administrators to reach residents and communities with opportunities for improving energy affordability, accessing clean energy solutions, improving awareness and education of clean energy opportunities, connecting with essential services,⁷⁹ and otherwise accessing the full range of benefits of the clean energy economy.

The following sections provide further Information on the featured elements listed above.

5.1 LMI Portfolio Marketing

Statewide LMI Portfolio marketing includes four broad elements: (1) statewide branding; (2) the NY Energy Advisor website; (3) branded hard-copy program outreach and informational materials to complement the online NY Energy Advisor website; and (4) delivery of community-based marketing and paid advertising.

Statewide Branding

The Program Administrators have developed statewide branding, including names, logos and designs, to provide consistent messaging and increased awareness of the Statewide LMI Portfolio in conjunction with localized marketing implemented by the Utilities in their respective territories. The following programs currently use statewide branding: EmPower+, AMEEP, and FlexTech. NY Energy Advisor and its marketing campaign represent an additional statewide branding effort and name.

Key considerations in facilitating effective statewide branding include development of a clear, concise message as to the program being offered, the Program Administrator leading the effort, customer eligibility,, and the benefits of participation.

⁷⁹ These are services outside of the LMI initiative that facilitate participation in the initiative, which may be referred to as “wraparound.” For example, a customer may need a new roof in order to qualify for attic insulation under the EmPower NY initiative and receives the new roof from a community program that funds such repairs.

NY Energy Advisor

In 2021, the Program Administrators developed and launched a web-based customer hub platform, called NY Energy Advisor, to provide streamlined, easy-to-access information about LMI initiatives and services for LMI customers, affordable multifamily property owners and managers, contractors, and stakeholders throughout the state. The platform connects its users with relevant LMI programs and services, including energy efficiency, renewable energy, and energy education materials. It is also designed to reduce customers' need to search for assistance on multiple websites.

The site provides:

- Information on the Portfolio offerings
- Links to program intake forms
- Contact information on how to access community outreach representatives (see [Section 5.3](#), below)
- Links to other programs and resources (i.e., WAP, etc.), as appropriate for the audience
- Access to information in multiple languages (22 languages currently)
- Translation functionality to automatically self-translate into English, Spanish, Mandarin or Russian

To promote awareness of the NY Energy Advisor, the Program Administrators deploy paid media marketing campaigns, which include social media posts, digital banners, and public service announcements (both broadcast television and radio) with media outlets. Marketing materials are adjusted and updated over time based on paid media metrics and customer feedback. Paid media efforts are optimized in real-time to maximize efficiencies within the buy and engagement. The paid media effort as well as any organic interaction are monitored so that it can be determined how many visitors to energy advisor are clicking through to learn more, apply now or even making the decision to reach out to their Community Hub contact to have a discussion.

Additionally, a New York Energy Advisor tool kit containing resources for stakeholders is available on the NYSERDA-hosted LMI Resources New Efficiency: New York webpage.⁸⁰ The toolkit includes downloadable fact sheets, posters, and social media information for use by stakeholders to promote the NY Energy Advisor. A tutorial video demonstrating how to use the NY Energy Advisor website is also available. These materials are being evaluated now and there is a plan in place to further expand the assets within it by using market feedback and research study results to determine which materials are most

⁸⁰ <https://www.nyserda.ny.gov/All-Programs/Residential-and-Property-Owner-Income-Eligible-Programs/LMI-Stakeholder-Resources-New-Efficiency-New-York>

beneficial to customers but also can help educate them so that they can make an informed decision.

The costs for marketing, advertising, consumer perception/awareness surveys, and maintenance of the NY Energy Advisor are shared by the Program Administrators. The co-funding agreement to pay for these costs was based on the approved cost sharing method used by the Technical Resource Manual (“TRM”) Committee.⁸¹ As NYSERDA is not included in the TRM cost sharing agreement, NYSERDA’s share is based on its percent of the Implementation Plan budget. The Utilities’ cost share will be the remaining amount prorated among the Utilities as outlined in the TRM Management Plan.

An agreement was developed and executed between NYSERDA and each of the Utilities that delineated the process for reviewing details related to the marketing and maintenance of NY Energy Advisor. NYSERDA will continue to take the lead with marketing and maintenance, engaging a contractor to provide the necessary work. The agreement set in place cost sharing responsibilities, a process to review details of the campaign, costs associated, and how and when reimbursements to NYSERDA will be made.

In the future, the Program Administrators will continue efforts to increase market awareness and use of NY Energy Advisor. The site will also be adjusted and updated based on evaluation of paid media, stakeholder, and customer feedback.

Hard Copy Customer Education Collateral and Multilingual Communications

While the online NY Energy Advisor is a critical resource for providing information to LMI customers, approximately 7% of adults nationwide, of which 25% are aged 65 and older,⁸² do not have access to a computer or mobile device in their home. To address this fact, the Program Administrators complement the NY Energy Advisor website with written materials that provide similar branded messaging about Portfolio offerings. These materials are distributed for use by contractors and community-based partners to hand out to their clients. The focus of the materials is providing initiative information and encouragement for customers to take action by calling their utility, NYSERDA’s customer service center, or Clean Energy Hub to receive assistance in applying for

⁸¹ See, Technical Resource Manual Management Plan filed August 15, 2018 in Cases 14-M-0101, 15-M-0252 and Matter 15-01319. Cost share percentages were informed by EM&V work previously completed under the directives and guidance provided in Case 07-M-0548, *Proceeding on Motion of the Commission Regarding an Energy Efficiency Portfolio Standard (“EEPS”)*. The cost share percentages outlined in this document are derived from contract negotiations among the TRM MC member companies, which occurred as part of bringing the TRM Administrative Vendor on board.

⁸² Pew Research Center – April 2, 2021 “7% of Americans don’t use the internet and who they are”

participation. Currently, collateral is available in several languages (English, Chinese, Russian, and Spanish).

Community-Based Marketing and Paid Advertising

To complement the NY Energy Advisor and the community-based outreach and education elements described above, the Program Administrators may conduct multi-lingual marketing through local media, with an emphasis on marketing delivered through local news outlets and community officials and opinion leaders. The Program Administrators may look to leverage their community-based partners' relationships with local media and ability to garner earned media to promote programs.

Additional local marketing may include paid advertising to raise awareness about the LMI programs. Examples of paid advertising that may be considered are:

- Public transportation posters and billboards
- Google searches
- Social media
- Local electronic and print media
- Direct mail/email campaigns tailored to LMI customers who have been identified as categorically eligible based on geographic eligibility guidelines, or who are identified in utility customer databases as being eligible for HEAP or low-income rate discounts

Objectives:

- Provide consistent messaging statewide
- Develop clear, concise messaging as to what is being offered, where to find the offerings, who is offering them, who qualifies for the offerings, and the value of participation
- Provide streamlined, easy access to LMI initiatives and services for LMI customers, affordable multifamily property owners and managers, contractors, and stakeholders throughout the state
- Complement the NY Energy Advisor website with written materials that provide similar branded messaging about Portfolio offerings
- Identify and develop solutions to overcome barriers of engaging LMI customers and other stakeholders
- Raise LMI customer awareness about Portfolio initiatives and services
- Establish inclusive outreach campaign that reflects the diversity of LMI New Yorkers

Technical Details

Market Segment Addressed	LMI customers, affordable multifamily property owners and managers, contractors, and stakeholders throughout the state
Delivery Method	NY Energy Advisor website, hard copy collateral, paid advertising, community engagement
Key Partners	Community-based organizations

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<p>NY Energy Advisor:</p> <ul style="list-style-type: none"> • Leverage campaign learnings from 2022 & 2023 to guide media strategy and improved channel selection • Drive increased quiz starts that will connect customers with assistance programs • Due to successful engagement, targeting for 2024 (beginning in 2023) will see an expansion in Hispanic Audience targeting 	In Progress
2024	<p>NY Energy Advisor:</p> <ul style="list-style-type: none"> • Continue to identify key opportunities to evolve outreach for both online and offline audiences • Build upon success and learnings to date by leveraging highest-performing paid media placements and expanding language access across channels • Leverage Clean Energy Hub, Community and Partner feedback to create assets, collateral and continue to build awareness for NY Energy Advisor and it’s solutions for LMI New Yorkers. 	Future

5.2 Community-Based Outreach, Education, and Engagement Partnerships

Access to clean energy programs and resources and the broader set of benefits they bring can be more difficult for LMI households and DACs, due to the various economic and institutional barriers present in the LMI customer segment. To increase adoption of energy efficiency and realize the benefits of clean energy, it is therefore important for Program Administrators to work with CBOs, who are trusted resources in the community,

to connect residents with program opportunities, increase awareness and education of clean energy issues, educate residents on ways to reduce energy consumption and bills, leverage workforce development opportunities, and identify services necessary to undertake energy efficiency projects.

The Regional Clean Energy Hubs:

- Act as a trusted local resource for community members to learn more about the energy-related programs and services available to them
- Increase awareness of these programs and services by leveraging the expertise and trust of local community organizations— particularly those with a proven track record of engaging disadvantaged communities
- Develop outreach and engagement strategies to elevate the needs of communities and residents into program and policy development
- Address gaps in and advancing diversity of the clean energy workforce by connecting residents with educational, training, and job opportunities and small businesses with resources to support economic development

Expansion of Existing LMI Community Partnerships

NYSERDA has established Regional Clean Energy Hubs (“Hubs”), one in each of the ten economic development regions across the state, with the exception of the New York City region where three hubs have been established, to assist communities and residents with accessing clean energy programs and solutions. Investment in the establishment of Hubs is intended to build capacity at the local level and position DACs to participate in and benefit from the clean energy economy.

Objectives:

- Increase awareness of and access to clean energy solutions and opportunities
- Increase consumer uptake of clean energy projects, with support for accessing wraparound (non-energy) services and resources
- Expanded and improved market-wide consumer education landing environment designed to assist users in finding the best incentive programs and offers available to them, in particular, helping all income-eligible consumers find LMI resources through resources such as the Energy Advisor and Clean Energy Hubs quickly and easily.
- Advance local capacity to engage with community members about clean energy policy, technologies, and opportunities
- Increase public participation in energy planning and program coordination activities
- Increase partnerships with clean energy partners, affordable housing providers, non-energy partners, third-party funding providers, philanthropic organizations, etc. that result in scalable activities and projects
- Increase the diversity of participating contractors in the clean energy sector

- Support career pathways for individuals currently residing in disadvantaged communities or from priority populations, through partnerships with training, education, and clean energy businesses for employment opportunities in the clean energy workforce

Technical Details

Market Segment Addressed	Homeowners, renters, contractors/builders, affordable property owners, small commercial entities and nonprofits with an emphasis on DACs
Delivery Method	<ul style="list-style-type: none"> • Hubs deploy Energy Advisors within each region to connect community members to clean energy and related programs and resources <ul style="list-style-type: none"> • Hubs deploy energy literacy workshops to educate customers on energy efficient technologies and self-install energy measures • Hubs increase awareness and program access assistance to clean energy programs and resources • Hubs increase uptake of clean energy projects, with support for accessing wrap around services and resources. • Hubs will Implement community campaigns and local projects and pilots
Key Partners	<p>Key community-based partners will play an important role with the Regional Clean Energy Hubs and generally include:</p> <ul style="list-style-type: none"> • CBOs • Local, state, and federal agencies • Regional Economic Development Councils (“REDCs”) • Ecumenical organizations and communities • Philanthropic organizations • Low-income and affordable housing advocacy groups • Community coalitions and associations • Homeowner and tenant associations • Educational institutions • Corporations and trusts • Banks and financial institutions, particularly community development financial institutions (“CDFIs”) • Environmental, health, and energy efficiency advocacy groups (national, statewide, and local) • Skilled trade groups, unions, and engineering societies • Retailers and installation contractors • Community event organizers (fairs, home shows, etc.) • Small businesses and Business Improvement Districts (“BIDs”) • Utilities

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none">Hubs fully operational in the market and working within regions to support and streamline program engagement	In Progress
2024	<ul style="list-style-type: none">Hubs to begin launching community campaigns and local pilot programs	Future

5.3 Community-Based Customer Engagement and Innovative Outreach Initiatives

In addition to their collaboration in administering statewide LMI portfolio initiatives, the New York Utilities partner with organizations in their service territories who directly or indirectly serve or advocate on behalf of the LMI community. Utilities plan to continue these partnerships to engage eligible LMI customers through customized educational efforts and the distribution of free or discounted direct install measures directly or through trusted local organizations on an opt-in basis.⁸³ These engagement initiatives provide customers with easy access to energy efficiency information, promote proven technology (e.g., installation of LED lighting measures), and increase awareness of other efficiency programs offered in the Portfolio, including direct install measures, behavioral action recommendations, and general efficiency education.

Further, the Utilities, in coordination with NYSERDA, test and implement innovative approaches to customer awareness and engagement through leveraging Utility engagement channels.

Types of initiatives include:

- Working with local food banks to distribute LEDs to low-income customers
- Distributing energy efficiency kits to customers participating in Utility low-income bill discount programs
- Working with measure vendors, local community-based organizations, and public agencies to provide free or heavily discounted energy efficiency measures to LMI customers
- Distributing home energy reports (HERs) to LMI customers with customized energy efficiency recommendations
- Leveraging Utility engagement channels to test and implement innovative approaches to advancing customer awareness and participation in EmPower+, such as text message campaigns, enhanced messaging to customers on utility energy assistance programs (“EAPs”), social media marketing, landlord-focused

⁸³ Sponsoring utilities will avoid distribution of unsolicited measures, which can lead to low installation rates and customer complaints.

outreach, and efforts to improve demographic gaps in participation. (More detail is provided below.)

As part of the LMI JMC, the Program Administrators share experiences and lessons learned from offering these initiatives with each other. Looking towards the future, the Program Administrators plan to continue to work together to share insights into these different programs and explore further coordination on similar initiatives.

Details regarding specific Utility initiatives are provided below:

Central Hudson

Central Hudson will continue to offer its Community Lighting program under the Portfolio and distribute LED bulbs at no cost through partnerships with local not-for-profit organizations that serve low-income customers through 2023. This initiative targets customers utilizing services from organizations such as the United Way and food pantries. Additional information is provided with the LEDs to educate customers about energy savings, payment assistance programs, and the NY Energy Advisor. Central Hudson will evaluate opportunities to extend this program into 2024.

Con Edison

Con Edison continues to educate LMI customers about energy efficiency through various programs and outreach initiatives. Energy saving kits remain available to customers participating in Con Edison's Energy Affordability Program. This opt-in program provides customers with kits that can include three LED lightbulbs, two faucet aerators, and a low-flow showerhead. Con Edison also maintains partnerships with food banks to help assist in distributing LED lights to customers who may otherwise face adoption barriers. In 2023, Con Edison incorporated the Smart Kids program into its LMI portfolio of programs and initiatives. Teachers in Title I Schools in Con Edison's service territory may opt-in to receive energy saving kits for their classes. Smart Kids educates students and teacher about energy efficiency through specified curriculum and hands on engagement with kits containing energy efficiency equipment.

NFGDC

In 2023 and going forward NFGDC's outreach programs continue to provide weatherization kits to area block clubs, community-based organizations, and area non-profits. The majority of these block clubs and organizations support customers within DACs or those in low-income areas. Although this program benefited LMI customers, the

funding related to this effort came from non-LMI sources, so associated savings and participant numbers are not included in this Plan.

National Grid

National Grid continues to work with food banks across the Niagara Mohawk territory to distribute LED bulbs to customers with brochures containing information on energy efficiency and payment assistance programs such as EmPower+, HEAP, National Grid's Energy Affordability Program ("EAP"), and assistance provided by National Grid's Consumer Advocates. This initiative started in the Buffalo area by collaborating with Feed More WNY and has since expanded across the greater Syracuse and Albany metropolitan areas to cover all of the Niagara Mohawk territory. National Grid will continue to collaborate with NYSEG to realize cost efficiencies in their overlapping service territories and looks forward to collaborating with NYSERDA's Regional Clean Energy Hubs to continue distributing LED bulbs and these informative program materials.

In addition, in January 2023, National Grid has launched a Foodbank program in its downstate, KEDLI service territory, providing vouchers for fully paid natural gas fired heating equipment clean and tune service by a selected qualified HVAC local contractor. The program serves as a launch pad for getting income eligible customers to get a taste of the larger KEDLI HEAT program on a smaller scale and ultimately proceed to apply for broader weatherization services of the program, including and starting with the home energy assessment. This Foodbank initiative has been successful and is growing a significant pipeline of interested customers to participate in KEDLI HEAT. As a result, this effort will continue in 2024 and 2025.

Finally, National Grid is committed to promoting and increasing customer participation in the Empower+ program administered by NYSERDA. Based on the lessons learned from marketing and outreach activities executed in 2022 and 2023 in partnership with other Joint Utilities from the 1-4 Family subcommittee, including ABC email messaging, National Grid text message, postcards and social media campaigns and Joint Utilities customer surveys, National Grid has compiled a consistent and regular outreach and education plan. It is tied to monthly Empower+ referral process and consists of preemptive text message sent to the monthly referral batch of customers with the phone number on file, with the primary call to action to get acquainted with Empower+ program by visiting National Grid's dedicated webpage specific to the program. From there and upon reading a high-level program description, benefits and eligibility requirements, the customer can proceed to either learn more by clicking the link to NYSERDA's Empower+ website or proceed directly to the application. Furthermore, the same batch of customers will receive a reminder text message the following month, after they have received welcoming package in the mail from NYSERDA along with the paper

application, with the main call to action directing customers to apply to Empower+ program via the provided direct link to the application. Finally, customers without a phone number on file will be accumulated over the time frame of a quarter and will be receiving marketing collateral in the mail. Supplementally, National Grid will be running regular social media campaigns as well as text messaging to past nonconverted referrals.

New York State Electric and Gas

NYSEG continues efforts to educate customers on energy efficiency through various programs and outreach. We regularly team up with our internal Customer Advocates and our internal Government and Community Relations department(s) on joint local outreach activities. We distribute energy savings kits to eligible customers at community events and not for profit organizations that are located within a DAC and/or highly likely to service low-income customers. Customers are provided immediate solutions to help reduce energy usage while at the same time providing references and visibility to EmPower+ and AMEEP.

NYSEG also uses the Retail Products Program to supplement our reach to LMI customers by establishing increased focus toward retail channels that have a higher propensity to serve LMI customers. NYSEG incorporated the School Kits outreach into its LMI portfolio. Teachers in Title One Schools in New York State Electric and Gas territories may opt-in to receive energy saving kits for their classes. The program teaches students and parents energy saving practices through curriculum integrated lesson plans and firsthand engagement with kits containing energy efficiency equipment. Each kit cross promotes EmPower+ and other energy efficiency programs.

Finally, we have EmPower+ banners at kiosks in our bill payment centers which provides the value proposition of Empower as well as the 800# and website information to enroll.

Orange & Rockland

Orange and Rockland will continue and expand their food bank LED light bulb kit offering, which includes messaging to educate customers about energy efficiency and includes a link to Orange & Rockland's EmPower webpage to drive awareness of the program. Additionally, in 2023, O&R expanded the existing MY ORU Store ecommerce platform to include additional functionality that offer new tools, products, and enhanced rebates that will engage and guide LMI customers to make energy wise decisions for their home.

In 2023 and 2024 Orange and Rockland will be doing education and outreach at local schools, senior centers, community centers, and other community organizations. There will be a focus on Title 1 schools, DAC communities, and LMI communities. We will be

educating everyone on the programs available and bill assistance programs that are available as well as discussing energy saving tips, renewable energy, energy service careers, and conservation tips. Participants will receive educational books/pamphlets to take home as well as customized rebates/coupons for Energy Saving products on the MY ORU store.

Rochester Gas and Electric

RG&E continues efforts to educate customers on energy efficiency through various programs and outreach. We regularly team up with our internal Customer Advocates and our internal Government and Community Relations department(s) on joint local outreach activities. We distribute energy savings kits to eligible customers at community events and not for profit organizations that are located within a DAC and/or highly likely to service low-income customers. Customers are provided immediate solutions to help reduce energy usage while at the same time providing references and visibility to EmPower+ and AMEEP.

RG&E also uses the Retail Products Program to supplement our reach to LMI customers by establishing increased focus toward retail channels that have a higher propensity to serve LMI customers. RG&E incorporated the School Kits outreach into its LMI portfolio. Teachers in Title One Schools in Rochester Gas and Electric territories may opt-in to receive energy saving kits for their classes. The program teaches students and parents energy saving practices through curriculum integrated lesson plans and firsthand engagement with kits containing energy efficiency equipment. Each kit cross promotes EmPower+ and other energy efficiency programs.

Finally, we have EmPower+ banners at kiosks in our bill payment centers which provides the value proposition of Empower as well as the 800# and website information to enroll.

Objectives:

- Increase LMI customer awareness of the financial, comfort, health & safety and environmental benefits of energy efficiency and clean energy
- Promote participation in deeper LMI efficiency programs
- Capture direct savings from the installation of no- or low-cost energy efficiency measures (*e.g.*, LED bulbs, showerheads, faucet aerators, advanced power strips) to LMI customers through trusted community partners
- Provide behavioral recommendations to improve LMI customer home comfort and efficiency
- Build customer trust in and appreciation of participating organizations and sponsoring utilities, leading to greater willingness to participate in other LMI programs

- Build relationships with participating community-based partners, leading to their participation in promoting other Statewide LMI Portfolio programs

Technical Details

Market Segment Addressed	LMI customers
Delivery Method	Information and measures distributed through community-focused methods and community organizations that are trusted and frequented by LMI customers. Measures may also be distributed directly from the utilities through program vendors.
Eligible Measures	Programs may include LED lightbulbs, energy efficiency kits (which may contain measures such as LED lightbulbs, low-flow showerheads, and faucet aerators), and other low-cost measures
Incentive Structure	Varies, but generally no cost to customers
Key Partners	Key partners include: <ul style="list-style-type: none"> • Food banks • School districts • Non-profits • Local community organizations • Local public agencies

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none"> • Utilities to continue to offer, assess, and improve Community-Based Customer Engagement Initiatives (as described above in Section 5.3) • Utilities to adopt, assess, and implement strategies for improving customer awareness of and participation in EmPower+ on an individual or collective utility basis 	In Progress

2024	<ul style="list-style-type: none"> • Utilities to continue to offer, assess, and improve Community-Based Customer Engagement Initiatives (as described above in Section 5.3) • Utilities to adopt, assess, and implement strategies for improving customer awareness of and participation in EmPower+ on an individual or collective utility basis 	Future
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6. Coordination with External Program Administrators and Other Organizations

In addition to coordination across the Program Administrators, there are additional opportunities to work with programs administered by New York State agencies, local government, and CBOs to reduce redundancy and to increase coordination, effectiveness, and impact for the customer.

Table 7: Summary of Statewide Coordination Efforts

Organizations	Nature of Coordination
New York State Department of Environmental Conservation	<ul style="list-style-type: none"> • Explore opportunities to improve energy and health outcomes in environmental justice and DACs • Support operationalization of Climate Act investment requirements
DOH	<ul style="list-style-type: none"> • Develop an approach to quantify the health outcomes and healthcare cost reductions associated with energy efficiency improvements • Explore opportunities for developing a programmatic approach for addressing energy efficiency and healthy homes improvements for low-income customers
NYS HCR	<ul style="list-style-type: none"> • Support the development of technical capacity and access to performance data (<i>e.g.</i>, benchmarking) • Explore systematic improvements to policies and processes so that the benefits of clean energy are embedded upstream of tenants and building owners, such as: <ul style="list-style-type: none"> ○ Exploring opportunities to increase energy performance requirements associated with the Low-Income Housing Tax Credit and the Qualified Allocation Plan;

	<ul style="list-style-type: none"> ○ Advancing adoption of an IPNA, in coordination with other key stakeholders including housing authorities; ○ Exploring the development of underwriting criteria for high performance new construction and preservation projects, based on reduced operational costs; and ○ Piloting model-based utility allowances in New York, in coordination with other key stakeholders. ● Alignment between WAP and EmPower+ to reduce overlap and administrative burden for the agencies, service providers, and customers ● Support mobilization of New York’s \$289 million WAP funding allocation under the Bipartisan Infrastructure Law of 2021
NYS Office of Temporary and Disability Assistance	<ul style="list-style-type: none"> ● Maximize the reach of HEAP funds through increased consumer education and targeted efficiency services
Low-Income Energy Program Interagency Task Force ⁸⁴	<ul style="list-style-type: none"> ● Development of a cohesive approach to serve low-income energy customers across the programs administered by New York State agencies to reduce redundancy and increase coordination, effectiveness and impact for the customer.
PSEG Long Island	<ul style="list-style-type: none"> ● Coordination between KEDLI’s HEAT Program and PSEG Long Island’s REAP program, where the Program Administrators exchange leads so customers can participate in both gas and electric energy efficiency programs ● Explore opportunities to more closely coordinate the AMEEP program with multifamily programs offered by PSEG Long Island
Long Island Power Authority	<ul style="list-style-type: none"> ● Coordination with LIPA through programming such as EmPower+ and HEAT to leverage statewide models

⁸⁴ The Low-Income Energy Program Task Force was formed by the Office of the Governor in May 2016 to bring together the New York State agencies responsible for administering low-income energy programs for developing a cohesive strategy for serving LMI energy customers, increasing coordination and sharing information.

The Joint LMI Management Committee will continue to examine and address the coordination of work with external program administrators to see that the Statewide LMI Portfolio effectively delivers clean energy solutions to LMI customers and communities.

7. Benefit Cost Analysis

This section presents the results of the Benefit Cost Analysis (BCA) for the Statewide LMI Portfolio of initiatives.⁸⁵

The Program Administrators calculated the BCA following the NYS BCA Framework⁸⁶ and subsequent DPS guidance.⁸⁷ A common approach was used to calculate the Portfolio BCA found in [Table 8](#) and Program Administrator-specific assumptions were used according to utility BCA handbooks.

The BCA results reflected in Table 8 will continue to be refined as the initiatives are further developed. The BCA results for the Societal Cost Test (“SCT”) include the benefits associated with reduced carbon emissions, calculated in line with the most recently updated values promulgated by the New York DPS for 2023 and beyond.⁸⁸ Revisions to program designs, including the removal of some direct install measures, reduced projected savings from LED lighting, and reduced activity for some utility programs drove the differences between 2022 and 2023 BCA’s projected benefits. Portfolio BCA results are largely comparable for the Utility Cost Test (“UCT”), though there are changes for individual Program Administrators. SCT results in 2023 are approximately 80% lower than those reported in 2022 for program years 2024–2026. This reduction is driven in large part by the inclusion of more wholistic participant leveraged funds as part of the NYSERDA CEF family of programs, which were not calculated in the same manner in prior evaluation cycles.

Portfolio-level BCA results are shown in Table 8.

⁸⁵ While the Program Administrators provided an updated BCA in 2022 (*i.e.*, NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio Implementation Plan, Version 2 (filed April 29, 2022)), a new BCA was not conducted for the Nov. 1, 2022 filing or May 1, 2023. A new BCA will be conducted in conjunction with the next annual Implementation Plan to be filed, scheduled for filing in the fall of 2023.

⁸⁶ Case 14-M-0101, *Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision*, Order Establishing the Benefit Cost Analysis Framework, (issued January 21, 2016).

⁸⁷ Clean Energy Guidance CE-07: *Utility-Administered Energy Efficiency Utility Filing Requirement Guidance* (issued May 14, 2018).

⁸⁸ https://www.dec.ny.gov/docs/administration_pdf/vocapp22.pdf

Table 8. Statewide LMI Portfolio BCA Results

	Societal Cost Test (SCT)			Utility Cost Test (UCT)		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$196,650,169	\$195,549,118	1.01	\$117,750,585	\$152,399,572	0.77
2024	\$240,854,415	\$936,150,265	0.26	\$145,619,973	\$199,147,662	0.73
2025	\$289,898,579	\$553,260,483	0.52	\$176,882,741	\$221,892,403	0.80
2026	\$190,877,364	\$384,282,625	0.50	\$139,501,405	\$91,149,186	1.53
2027	\$61,953,295	\$40,327,163	1.54	\$44,516,824	\$31,846,163	1.40
2028	\$57,627,818	\$21,008,031	2.74	\$41,479,468	\$19,029,764	2.18
2029	\$34,372,668	\$11,653,265	2.95	\$24,835,996	\$4,724,694	5.26

8. Evaluation, Measurement, & Verification Approach

As described below, the Program Administrators take a coordinated approach to estimating savings and evaluating LMI initiatives. This includes standardized statewide savings estimation approaches, collaborative evaluation activities, and continuous monitoring of and feedback on Performance Metrics. Specific program-level savings estimation approaches and evaluation schedules are detailed in the VGS Specifications, which are coordinated across the Program Administrators and are jointly filed with this Implementation Plan.⁸⁹

8.1 Savings Estimation

In general, the Program Administrators rely on the TRM and best practices to estimate savings and achieve VGS goals. Given that LMI customers often have older and less efficient equipment than their market-rate peers, and given the need to fully account for LMI customer savings, an existing baseline approach is employed where possible. To minimize administrative challenges that could result from using different baseline assumptions for different customer segments, particularly within a program that concurrently serves both LMI and non-LMI customers, the following overarching savings estimation approaches will continue to be used:

Prescriptive

For prescriptive measures, details of existing conditions in LMI customer residences may be substituted for parameters in the TRM to calculate savings.⁹⁰ The TRM currently

⁸⁹ The initial VGS Specifications were filed in December 2020. NE: NY Proceeding, Consolidated LMI VGS Specifications (Filed December 14, 2020). Updated VGS Specifications are being filed concurrently with this Implementation Plan.

⁹⁰ <https://www.nyserda.ny.gov/All-Programs/Low-to-moderate-Income-Programs/LMI-Stakeholder-Resources-New-Efficiency-New-York/NYS-Affordable-Multifamily-Energy-Efficiency-Program>.

contains language describing this methodology.⁹¹ Further, program manuals such as the AMEEP Program Manual contain guidance for providing information about existing conditions to be used in savings calculations. Additionally, baseline studies or other evaluation materials will be leveraged, where available, to calculate an average existing condition baseline that approximates the type and age of equipment currently installed by LMI customers. This will allow for a uniform deemed savings approach for common prescriptive measures within the Statewide LMI Portfolio, either at a statewide or more granular level depending on availability of data and measure-specific characteristics.⁹² Program Administrators plan to develop average existing condition baselines, facilitated through the TRM Management Committee, to allow for a uniform deemed savings approach for common prescriptive measures within the Statewide LMI Portfolio, either at a statewide or more granular level depending on availability of data and measure-specific characteristics. Using evaluation and other research data to determine these average baseline values will promote coordination of evaluation methodologies among Program Administrators (discussed in further detail below), and will allow for increased savings accuracy while minimizing the burden of customer data collection. This average baseline approach will also preserve implementation efficiencies by streamlining application processing and savings calculations.

If, for a particular measure, baseline studies or other supporting evaluation material is not available for determining an average existing condition baseline, standard TRM assumptions will be used until new information becomes available through evaluation activities or through other pertinent research facilitated by the TRM Management Committee (“MC”). Evaluation activities that will contribute to improving LMI-specific baseline assumptions will be detailed as part of established ETIP/SEEP and VGS Specification processes.⁹³ As baseline assumptions become available, they will be documented in VGS Specifications, incorporated into programs, and, through coordination with the TRM MC, documented in the TRM.

Custom

For custom measures, project-specific existing condition baselines are used. Analyses of current custom calculation tools, and integrating the TRM’s Custom Category 6 standard

⁹¹ Technical Resource Manual, Version 10 - Filed December 22, 2022 (effective January 1, 2023), p. 5, “Application of Methods for Low- and Moderate-Income (LMI) Residential.” <https://dps.ny.gov/technical-resource-manual-version-10-filed-december-30-2022-effective-january-1-2023>

⁹² For example, a granular approach may be warranted for certain HVAC measures to distinguish the prevalence of steam heating in downstate multifamily buildings. Where granular data is not available, a statewide average should be used.

⁹³ For each program a Program Administrator administers, the Program Administrator will submit a VGS Specification. Where there are coordinated programmatic and/or evaluation activities, VGS Specifications will be coordinated as well.

simulation approach for custom measures and packages are ongoing, and updates will be made to align savings methodologies in these tools with the TRM and an existing condition approach as necessary.

8.2 Performance Metrics Planning

In [Section 2.4](#), above, the Plan addresses Performance Metrics for the Statewide LMI Portfolio, including Table 1: Portfolio Objectives and Performance Metrics. As noted in Table 1, for certain of the metrics, EM&V is a key component, including the following:

Portfolio Customer Experience	
Increase customer Portfolio awareness	Percentage of LMI customers that learn about Portfolio initiatives from various sources (<i>e.g.</i> , NY Energy Advisor website, Utility or NYSERDA outreach materials, contractors, etc.)
Achieve high customer satisfaction	Participation satisfaction rating
Advance energy affordability for LMI customers	Participant bill savings, annual and lifetime

As such, a key component of EM&V-related planning is addressing these (and possibly other) performance metrics.

Program Administrator EM&V team activity to research and evaluate performance for these metrics may include the following:

- Surveys
- Coordination with EM&V contractors to study and determine outputs for the factors
- For the three Portfolio Customer Experience performance metrics, the third-party evaluator chosen for the statewide evaluation will determine the methods for calculating the metrics in coordination with the Program Administrators.

8.3 VGS Specifications

The Program Administrators have continued to undertake VGS activities since the 2020 Implementation Plan filing, including continued development and revisions of the VGS Specifications. The VGS Specifications for the Statewide LMI Portfolio are organized into four sections: Existing 1-4 Family Homes, Existing Affordable Multifamily Buildings, Affordable New Construction, and Additional LMI Initiatives. Key activity and issues for each of these categories is described below; additional information and detail is provided in the VGS Specifications themselves.

Existing 1-4 Family Homes

The NYSERDA administered EmPower program completed an evaluation in 2022.⁹⁴ The program has a 62% realization rate for electric programs and 73% for gas programs. The Assisted Home Performance with Energy Star program has 53% realization rate for electric programs and 66% for gas programs. As the 1-4 Family Homes programs are shifted from separate Empower NY and AHP programs to the combined EmPower+ program, the Program Administrators will update the VGS activities and the VGS Specification to reflect this shift. With the launch of the statewide EmPower+ program in 2023, a Gross Savings Analysis will be undertaken in 2024 and results will apply to the program from EmPower+ launch onwards. National Grid also operates the Home Energy Affordability Team (HEAT) program in its KEDLI territory on Long Island. HEAT, a gas-only program, is currently using a realization rate of 98%.

Existing Affordable Multifamily Buildings

The Program Administrators are undergoing a joint procurement process to select a vendor to run a process and impact evaluation study statewide for AMEEP. A vendor is expected to be selected in Q1 2024. Upon completion of the AMEEP evaluation, Program Administrators will apply results retroactively, beginning January 1, 2022. Until completion of this evaluation, the Program Administrators will continue to use a 70% placeholder “adjustment factor” for statewide planning and forecasting purposes only. Where applicable, the Program Administrators will continue to use company-specific evaluation results for multifamily programs run prior to AMEEP for savings acquired in 2020 and 2021.

Affordable New Construction

Program areas offering incentives underwent Gross Savings Analysis for the program period 2016-2022. An initial VGS RR of 0.76 for electric savings and 0.85 for natural gas and propane were calculated for NYSERDA’s single family New Construction initiative (inclusive of LMI) for program period Q3 2016-Q2 2021. Alternative prospective RRs of 1.04 for electric savings and 1.13 for natural gas and propane were calculated for program years Q3 2021 to Q4 2022; however, per DPS VGS guidance, AP RRs cannot exceed 1.0 and reporting will only show AP RRs of 1.0. An updated VGS RR of 0.86 for electric savings and 1.04 for natural gas and propane savings were calculated for the period starting Q1 2023. These RRs were finalized in Q2 2023.

Additional LMI Initiatives

⁹⁴ NYSERDA Residential Retrofit Impact Evaluation (PY 2017-Q1 2019), filed in October 2022.

EM&V for the programs addressed in this specification is conducted separately by the relevant Program Administrator. Programs include:

- NYSERDA: NYSEERDA administers Healthy Homes and the Solar for All program.
- Central Hudson: Central Hudson’s Community Lighting program provides LED bulbs to customers that utilize services from organizations such as United Way.
- Con Edison: Con Edison offers additional programming to its LMI customers through Food Bank Bulb Distribution (“Food Bank”) as part of its Retail Lighting program. Additionally, Con Edison offers an Efficiency Starter program, which provides free kits of low-cost energy savings measures to LMI customers. Since 2020, Con Edison has also been sending focused messaging to LMI customers via Home Energy Reports (HERs). In 2023, Con Edison incorporated the Smart Kids program into its LMI portfolio of programs and initiatives. Teachers in Title I schools in Con Edison’s service territory may opt in to receive energy savings kits for their classes.
- National Grid: National Grid offers a Food Bank LED Light Bulb Giveaway in their Niagara Mohawk Service Territory.
- NYSEG/RG&E: NYSEG/RG&E distributes selected Energy Star certified equipment and energy saving measures through its LMI Distributions program. In 2023, NYSEG/RG&E started a School Kits program to distribute free energy saving kits to students who meet low income qualifications.
- Orange and Rockland: Orange and Rockland continues to provide LMI customers with LED Light Bulb giveaways through food banks as part of its LMI Customer Engagement program. Orange and Rockland will also continue and expand its enhanced rebates to LMI customers through its online marketplace. In 2023, Orange and Rockland started an education and outreach program to schools, senior centers, community organizations and religious organizations. These educational presentations and outreach will be focused on low-income communities and include topics such as current programs available, energy saving tips, renewable energy education, and careers in the energy industry.

Collectively, these activities continue to provide important insight needed in the short term to optimize Portfolio offerings and increase the number of households served annually, while allowing the Program Administrators to work through data sharing, evaluation funding, evaluation timing, and other complexities.

To facilitate future coordinated evaluation activities, the Program Administrators will continue to identify specific opportunities for collaboration, focusing on activities where Program Administrators share customers and/or Implementation Contractors, or otherwise overlap. The Program Administrators will also continue to collaborate on data

collection tools and practices to streamline statewide evaluation and will embed LMI data collection into existing program evaluation when LMI customers are being served.

8.4 General Approach to Evaluation of Initiatives

Evaluation activities for the Statewide LMI Portfolio are coordinated among the Program Administrators where possible and are designed to provide insight into Performance Metrics tied to savings, participation, customer experience, and Portfolio efficiencies. These activities will also continue to be incorporated into the PM&IP.

It is important to note that statewide evaluations may be difficult to implement for all programs given that each Program Administrator may have a unique Portfolio mix, and that Utilities have different rate case periods that inform evaluation cycles. Additionally, individual Program Administrators may have recently evaluated, or are currently evaluating, certain programs that include LMI customers. These factors will continue to inform each Program Administrator's evaluation priorities and schedule of activities.⁹⁵ Given this, the Program Administrators continue work on non-program specific activities that will be able to provide meaningful insights across the State. As discussed earlier, this may include coordinated baseline studies with longitudinal updates. This may also include research to assist in identification of LMI buildings and customers to better serve these customers and communities, research around non-energy benefits, such as household safety and comfort, and other process evaluation activities.

VGS-compliant impact evaluation activities for programs that span all or many Program Administrators will also continue to be prioritized in the short term.

Where one Program Administrator is implementing a program on behalf of other Program Administrators, as in the case of EmPower+, the implementing Program Administrator takes primary ownership of evaluation activities, including the development process for VGS Specifications, and results from the administrator's evaluation will continue to be used in the reporting of savings achieved. In the case of AMEEP, where Program Administrators are jointly operating the program using a statewide framework, the Program Administrators are collaborating to perform a statewide evaluation. Program-specific realization rates are used, where available, until an evaluation of the new statewide offerings can be completed. This coordination will continue to be conducted as part of larger implementation arrangements at a program level and will be refined throughout 2023.

⁹⁵ Further discussion of programmatic evaluation frequency can be found in Clean Energy Guidance CE:08, *Gross Savings Verification Guidance* ("CE-08"). This guidance provides options for scheduling evaluation (Gross Savings Analysis) work, and states that "a PA may use evaluation results conducted on a program's performance within the preceding five-year period, if the program has not significantly changed and the evaluation results calculated a realization rate consistent with this guidance." CE-08, p. 9.

Implementation Milestones (2023-2025)

Year	Milestone	Status
2023	<ul style="list-style-type: none">• Continue ongoing meetings between Program Administrator VGS teams	In Progress
2024	<ul style="list-style-type: none">• Develop workplan, select EM&V vendor, and conduct statewide evaluation for AMEEP, as initiated in 2023• Continue to develop and implement average existing condition baselines, facilitated through the TRM Management Committee, and identify key LMI measures for further research• Begin EmPower+ evaluation process	Future

Appendix A: Budgets by Sector⁹⁶

A.1 Portfolio-Level Budgets by Sector (\$000)

Initiative	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes	53,970	73,892	96,328	49,342	31,614	32,435	-	-	-	-	-	337,581
Existing Affordable Multifamily Programs	17,732	24,819	34,243	53,310	70,453	87,152	34,308	30,999	19,523	5,379	-	377,918
Affordable New Construction	5,034	6,617	17,763	15,074	13,957	19,844	24,325	21,300	14,122	4,500	2,785	145,319
Customer Awareness, Outreach & Engagement	3,225	1,029	5,074	9,372	21,109	24,198	11,986	-	-	-	-	75,992
Pilots and Demonstrations	-	-	469	384	398	398	398	398	-	-	-	2,444
Beneficial Electrification	13	3,845	2,203	1,532	5,306	6,684	5,850	3,068	1,500	-	-	30,000
LMI Solar	1,283	895	837	1,400	1,348	1,300	1,287	1,163	1,100	1,100	-	11,713
Healthy Homes Pilot	921	285	530	1,945	4,160	1,983	-	-	-	-	-	9,825
Portfolio Administration	284	1,304	2,026	2,329	2,531	2,594	-	-	-	-	-	11,068
Portfolio EM&V	509	672	967	1,568	1,754	1,848	-	-	-	-	-	7,316
Total	82,969	113,358	160,440	136,256	152,630	178,434	78,154	56,928	36,244	10,979	2,785	1,009,176

⁹⁶ In general, marketing costs are included in the Portfolio Administration category of budgets in this Plan. For NYSEG RG&E, NYSERDA, and National Grid marketing costs are included in program implementation costs.

A.2 Portfolio Budgets Summary by Sector (\$000)

Initiative	Total	Percentage of Portfolio
Existing 1-4 Family Homes	337,581	33%
Existing Affordable Multifamily Programs (including Multifamily-related New Construction)	508,705	50%
Affordable New Construction (non-Multifamily)	14,532	1%
Customer Awareness, Outreach & Engagement	75,992	8%
Pilots and Demonstrations	2,444	0%
Beneficial Electrification	30,000	3%
LMI Solar	11,713	1%
Healthy Homes Pilot	9,825	1%
Portfolio Administration	11,068	1%
Portfolio EM&V	7,316	1%
Total	1,009,176	

A.3 Utility Incremental LMI NE: NY Funding Allocated to Existing Affordable Multifamily Buildings

The Accelerated Efficiency Order directed that at a minimum, 40% of the collective incremental LMI funding be committed to serving affordable multifamily buildings. The funding in this table represents the allocated utility incremental LMI funding from the Accelerated Efficiency Order and the 2020 NE: NY Order. This funding does not include additional utility funding that will be transferred into the Statewide LMI Portfolio from Central Hudson, NFGDC, National Grid (KEDLI), NYSEG, and RG&E (refer to Section 3 and Appendix A Table 4 for details regarding additional funding).

2020 - 2025	
Incremental LMI NE: NY Funding allocated to Affordable Multifamily	\$195,615,320
Total Incremental LMI NE: NY Funding	\$308,357,232
Percentage of Incremental LMI NE: NY Funding allocated to Affordable Multifamily	63%

A.4 Additional or Redirected Funds

Central Hudson, KEDNY, NMPC, NYSEG RG&E, and NYSERDA do not plan to incorporate additional funding or shift funds between electric and gas over the course of the portfolio.

Program Administrator	Amount	Portfolio Transferred From	Portfolio Transferred To	Associated Time Period	Description
Con Edison	\$27,447,066	LMI	LMI	2020-2025	Upon achievement of ordered electric targets, remaining LMI NE: NY electric funds will be transferred to gas in support of increased demand for gas efficiency measures.
National Grid (KEDLI)	\$10,000,000	Rate Case Funding: Case 19-G-0310	LMI	2020-2023	Rate case funding has been designated to support the KEDLI HEAT program in the 1-4 Family Homes portfolio for program years 2020-2023. Additional Dth savings target has been added to the KEDLI LMI portfolio in concert with this rate case funding.
NFGDC	\$34,739,657	Rate Case Funding: Case 07-G-0141	LMI	2020-2025	LIURP funds directed to LMI 1-4 Family Homes, Multifamily, Portfolio Administration, and EM&V.
Orange & Rockland	\$3,700,000	Market Rate NE: NY	LMI	2024-2025	Market Rate NE: NY funds transferred to LMI to support 1-4 Family Programs.

Appendix B: Utility LMI Ordered vs Planned Budgets and Benefits⁹⁷

B.1 Utility Electric LMI Ordered vs Projected Budgets and Targets

Company		2020-2025 Electric Budget	2020-2025 Target (MWh)
Central Hudson	LMI Implementation Plan	910,436	1,314
	NENY Order(s)	910,438	1,579
	Difference	-2	-265
	Difference (%)	0%	-18%
Con Edison	LMI Implementation Plan	34,202,869	106,935
	NENY Order(s)	61,649,935	106,935
	Difference	-27,447,066	0
	Difference (%)	-57%	0%
NMPC	LMI Implementation Plan	8,900,078	19,686
	NENY Order(s)	8,900,079	15,439
	Difference	-1	4,247
	Difference (%)	0%	24%
NYSEG	LMI Implementation Plan	9,840,500	25,498
	NENY Order(s)	10,296,587	17,862
	Difference	-456,087	7,636
	Difference (%)	-5%	35%
Orange & Rockland	LMI Implementation Plan	3,521,659	5,566
	NENY Order(s)	2,321,659	4,027
	Difference	1,200,000	1,539
	Difference (%)	41%	32%
RG&E	LMI Implementation Plan	5,064,018	14,753
	NENY Order(s)	5,243,397	9,096
	Difference	-179,379	5,657
	Difference (%)	-3%	47%

⁹⁷ Tables includes 2019 NE: NY ordered budget and targets and additional rate case funding and benefits, as applicable by Program Administrator. NFGDC Implementation Plan projected spend and savings do not account for 2019.

B.2 Utility Gas LMI Ordered vs Projected Budgets and Targets

Company		2020-2025 Gas Budget	2020-2025 Target (MMBtu)
Central Hudson	LMI Implementation Plan	2,124,357	6,003
	NENY Order(s)	2,124,356	19,667
	Difference	1	-13,664
	Difference (%)	0%	-106%
Con Edison	LMI Implementation Plan	143,478,393	1,176,138
	NENY Order(s)	116,031,327	1,074,165
	Difference	27,447,066	101,973
	Difference (%)	21%	9%
KEDLI	LMI Implementation Plan	30,101,132	116,848
	NENY Order(s), including additional rate case funding and benefits	30,101,131	278,667
	Difference	1	-161,819
	Difference (%)	0%	-82%
KEDNY	LMI Implementation Plan	24,395,776	225,872
	NENY Order(s)	24,395,776	225,844
	Difference	0	28
	Difference (%)	0%	0%
NFGDC	LMI Implementation Plan	38,495,972	278,827
	NENY Order(s), including additional rate case funding and benefits	42,130,455	307,501
	Difference	-3,634,483	-28,674
	Difference (%)	-9%	-10%
NMPC	LMI Implementation Plan	20,766,850	94,462
	NENY Order(s)	20,766,851	192,251
	Difference	-1	-97,789
	Difference (%)	0%	-68%
NYSEG	LMI Implementation Plan	18,398,591	99,869
	NENY Order(s)	18,894,023	174,910
	Difference	-495,432	-75,041
	Difference (%)	-3%	-55%
Orange & Rockland	LMI Implementation Plan	6,211,702	14,568
	NENY Order(s)	3,711,702	34,362
	Difference	2,500,000	-19,794
	Difference (%)	50%	-81%
RG&E	LMI Implementation Plan	9,228,842	55,753
	NENY Order(s)	9,253,656	85,666
	Difference	-24,814	-29,913
	Difference (%)	0%	-42%

B.3 NYSERDA LMI Budgets and Benefits Targets vs Planned Budgets and Benefits

Metric	LMI Implementation Plan	Target	Difference	Difference (%)
Total Budget* (\$)	\$653,534,768	\$726,066,776	\$12,615,819	2%
MWh Annual Savings	331,924	356,498	-24,574	-7%
MMBtu Annual Savings	8,218,033	8,908,710	-690,677	-8%

*NYSERDA currently manages and reports Administration, EM&V, and NYS Cost Recovery Fees at a broader Clean Energy Fund Market Development Portfolio (“CEF Market Development Portfolio” or “CEF”) level. To ensure that LMI expenditures and impact achievements can be assessed comprehensively, DPS has established the following LMI allocations for these costs: Administration + EM&V: 27%; Market Development Cost Recovery Fee: 26%. These allocations increase NYSEERDA's total Implementation Plan budget to \$739M.

Appendix C: Budgets and Benefits by Program Administrator

C.1 Central Hudson⁹⁸

The forecasted budgets and benefits below reflect Central Hudson's plan to fully spend the allocated budgets to support LMI customers. However Central Hudson is not forecasting that the Company will reach either the electric or gas savings target. The reasons include the challenges described above in the Executive Summary, such as inflationary pressures, material and labor costs, as well as low participation rates. Additionally, transformation of the lighting market has decreased opportunities for the distribution of LED bulbs through Central Hudson's Community Lighting program, which achieved over half of Central Hudson's ordered electric savings target between 2022 and 2023. Current forecasts are informed by program performance to date and projects visible in the program pipeline. Central Hudson will continue to work to expand awareness of and participation in LMI program offerings to achieve increased savings through these programs.

No Incentive or Implementation costs are associated with the Customer Awareness, Outreach & Engagement program as the cost for the measures distributed through this program were incurred as a bulk purchase before the program was incorporated into the LMI portfolio and the program is implemented by partner organizations.

⁹⁸ Central Hudson's 2024 and 2025 planned savings are reported as Gross Savings while prior years are reported as Verified Gross Savings to match Central Hudson's October 2023 SEEP. 2023 gas AMEEP savings are reported as 0 to reflect Verified Gross Savings of an unevaluated program, consistent with Central Hudson's October 2023 SEEP. 2022 gas savings differ from Central Hudson's October 2023 SEEP due to a revision to 1-4 Family Homes program data.

Electric Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			80,954	127,759	227,712	352,401	788,826
Program Implementation			7,206	14,834	24,046	37,213	83,299
Total Budget			88,160	142,593	251,758	389,614	872,125
Existing Affordable Multifamily Buildings							
Incentives & Services					287		287
Program Implementation					79		79
Total Budget					365		365
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services							
Program Implementation							
Total Budget							
Portfolio Administration				7,267	5,991	4,956	18,213
Portfolio EM&V				6,662	9,034	4,038	19,733
Total	-	-	88,160	156,522	267,148	398,607	910,436

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			217,564	334,731	579,834	728,965	1,861,094
Program Implementation			21,522	32,985	57,224	71,942	183,673
Total Budget			239,086	367,716	637,058	800,907	2,044,767
Existing Affordable Multifamily Buildings							
Incentives & Services				15,000			15,000
Program Implementation				1,600			1,600
Total Budget				16,600			16,600
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services							
Program Implementation							
Total Budget							
Portfolio Administration				7,267	5,991	4,956	18,213
Portfolio EM&V				14,765	20,543	9,469	44,777
Total	-	-	239,086	406,348	663,591	815,332	2,124,357

Electric Savings Benefit Distribution (MWh)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			50	66	204	316	636
Existing Affordable Multifamily Buildings					1		1
Affordable New Construction							
Customer Awareness, Outreach & Engagement			604	73			677
Total	-	-	655	139	205	316	1,314

Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			642	772	2,033	2,556	6,003
Existing Affordable Multifamily Buildings							
Affordable New Construction							
Customer Awareness, Outreach & Engagement							
Total	-	-	642	772	2,033	2,556	6,003

C.2 Con Edison

Con Edison develops its LMI Budgets and Benefits forecast based on the goals of meeting or exceeding the savings targets within the prescribed budget identified in the 2020 NE: NY Order directing utilities to allocate 20% of incremental funds toward LMI energy efficiency programs.

For 2024, Con Edison forecasts 2.7% growth in gas savings and 25% decline in electric savings as compared to 2023 while maintaining a pace to exceed total ordered gas targets by 9% and meet total ordered electric targets. This results in the Company planning to exceed total ordered energy savings, inclusive of both gas and electric savings, by 7% at the conclusion of the 2020-2025 NE: NY period.

Principally, this forecast reflects the Company's strategic shift away from behavioral and lighting programs toward comparatively expensive measures such as improving building envelopes to facilitate resilient energy savings. While Con Edison expects that unit costs associated with existing affordable multifamily projects to increase as the program focuses its attention on completing whole building energy retrofits to acquire deeper savings, projected unit costs for administering the Company's broader LMI portfolio under the NE: NY LMI budget will arrive at 7% lower than ordered unit costs.

Key portfolio highlights in 2023 include robust growth in multifamily roof insulation projects and the Company's decision to transition its Smart Kids program from its non-LMI to LMI portfolio. In 2024 and 2025, the Company expects to see continued growth in electric savings and a return to growth in gas savings due to increased customer demand. As such, once the Company meets its electric targets, it will shift the remaining funds to support gas efficiency projects.

Electric Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			468,000	343,200	468,000		1,279,200
Program Implementation			60,000	44,000	60,000		164,000
Total Budget			528,000	387,200	528,000		1,443,200
Existing Affordable Multifamily Buildings							
Incentives & Services	3,187,222	2,278,778	3,463,211	3,357,794	3,875,957	4,288,950	20,451,911
Program Implementation	461,955	538,641	320,809	311,044	359,043	397,300	2,388,794
Total Budget	3,649,178	2,817,419	3,784,021	3,668,838	4,235,000	4,686,250	22,840,705
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services	1,130,560	17,086	367,131	604,071	533,094	533,094	3,185,036
Program Implementation	1,097,967	166,459	307,512	330,824	202,924	202,924	2,308,611
Total Budget	2,228,527	183,545	674,643	934,894	736,018	736,018	5,493,647
Portfolio Administration	176,444	548,113	546,757	738,447	739,368	634,961	3,384,090
Portfolio EM&V	318,925	190,634	109,303	147,623	147,808	126,936	1,041,227
Total	6,373,073	3,739,711	5,642,724	5,877,002	6,386,194	6,184,165	34,202,869

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			1,535,625	1,066,406	1,333,008		3,935,039
Program Implementation			196,875	136,719	170,898		504,492
Total Budget			1,732,500	1,203,125	1,503,906		4,439,531
Existing Affordable Multifamily Buildings							
Incentives & Services	3,066,284	10,816,538	18,155,625	26,408,721	26,457,221	26,702,083	111,606,472
Program Implementation	865,848	2,808,057	2,881,906	4,191,949	4,199,647	4,238,515	19,185,923
Total Budget	3,932,132	13,624,595	21,037,531	30,600,670	30,656,868	30,940,598	130,792,395
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services	326,144	9,669	21,527	372,495	533,983	533,983	1,797,802
Program Implementation	474,685	6,314	15,733	185,282	263,972	263,972	1,209,957
Total Budget	800,829	15,983	37,260	557,777	797,955	797,955	3,007,758
Portfolio Administration	86,956	659,503	965,463	545,604	521,500	447,858	3,226,885
Portfolio EM&V	181,514	480,953	525,214	296,810	283,697	243,636	2,011,824
Total	5,001,431	14,781,034	24,297,968	33,203,986	33,763,926	32,430,047	143,478,393

Electric Savings Benefit Distribution (MWh)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			119	105	155	211	590
Existing Affordable Multifamily Buildings	3,937	3,831	4,644	4,479	4,952	5,248	27,091
Affordable New Construction							
Customer Awareness, Outreach & Engagement	34,594	9,317	10,002	11,493	6,924	6,924	79,254
Total	38,530	13,148	14,765	16,078	12,031	12,383	106,935

Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			2,253	4,101	4,483	5,603	16,439
Existing Affordable Multifamily Buildings	62,350	202,170	243,643	189,750	189,638	189,542	1,077,092
Affordable New Construction							
Customer Awareness, Outreach & Engagement	32,374	370	1,290	12,598	17,988	17,988	82,607
Total	94,724	202,540	247,185	206,449	212,108	213,133	1,176,138

C.3 KEDLI

The budgets and benefits presented here differ from the funding allocated in the 2020 NE: NY Order because additional funding and savings benefits have been added to the portfolio, as approved in KEDLI's most recent rate case, to support the HEAT program. Previously the HEAT program was funded solely through the Company's rate cases, but in order to better align with statewide efforts, is now incorporated into the Statewide LMI Portfolio.

The forecasted budgets and benefits below are based off the Company's plan to fully spend the allocated budgets to support LMI customers. However, between the programs currently existing in market, planned modifications, and upcoming initiatives, KEDLI is not currently forecasting that it will reach the ordered savings target. The reasons include the challenges described above in the Executive Summary, such as supply chain, inflationary pressures, material and labor costs, as well as historically low participation rates, especially from the multifamily market. These forecasts reflect what the Company views as most realistic, and work will continue towards acquiring savings to bring the portfolio closer to achieving its goal. Efforts to achieve more energy savings are described in more detail in the program descriptions within the body of this plan. In summary, KEDLI will continue to expand the KEDLI HEAT program to serve more customers, increase marketing and outreach efforts for the multifamily sector to spur more participation in AMEEP, develop and launch community-based initiatives to expand awareness of LMI program offerings, and develop relationships with relevant program administrators such as PSEG LI. As can be seen in the budgets table below, the budget for KEDLI HEAT decreases over 2024 and 2025 due to the funding remaining available in the portfolio.

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services	1,152,184	1,044,955	3,279,701	6,714,818	5,226,996	4,281,582	21,700,236
Program Implementation	378,391	360,136	570,825	1,219,968	957,411	791,042	4,277,772
Total Budget	1,530,575	1,405,091	3,850,525	7,934,786	6,184,407	5,072,624	25,978,008
Existing Affordable Multifamily Buildings							
Incentives & Services				110,425	500,000	1,344,130	1,954,555
Program Implementation				11,485	109,322	200,543	321,350
Total Budget				121,910	609,322	1,544,673	2,275,905
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services				558,275	-	-	558,275
Program Implementation			70,719	215,074	33,426	216,651	535,870
Total Budget			70,719	773,349	33,426	216,651	1,094,145
Portfolio Administration	20,364	4,921	1,113	12,200	1,000	7,000	46,598
Portfolio EM&V	8,109			193,746	237,260	267,361	706,476
Total	1,559,048	1,410,012	3,922,357	9,035,991	7,065,415	7,108,309	30,101,132
Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes	3,549	7,749	20,233	27,749	21,600	17,704	98,583
Existing Affordable Multifamily Buildings				939	3,983	10,108	15,030
Affordable New Construction							
Customer Awareness, Outreach & Engagement				3,235			3,235
Total	3,549	7,749	20,233	31,923	25,583	27,812	116,848

C.4 KEDNY

The forecasted budgets and benefits below are based off the Company's plan to fully spend the allocated budgets to support LMI customers. There have been challenges in ramping program participation up, such as those described in the Executive Summary above, like supply chain, inflationary pressures, material and labor costs, as well as a slower ramp up in completed projects in AMEEP. Despite the slow beginning to this portfolio, KEDNY is currently forecasting to reach the ordered goal. These forecasts reflect what the Company views as most realistic at this point.

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			900,001	399,218	165,000	165,000	1,629,219
Program Implementation			84,616	51,181	46,154	46,154	228,105
Total Budget			984,617	450,399	211,154	211,154	1,857,324
Existing Affordable Multifamily Buildings							
Incentives & Services			340,886	4,042,706	5,900,000	7,974,873	18,258,465
Program Implementation				702,248	1,065,570	1,349,146	3,116,964
Total Budget			340,886	4,744,954	6,965,570	9,324,019	21,375,429
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services				-	-	-	
Program Implementation			83,815	52,858	39,616	132,771	309,060
Total Budget			83,815	52,858	39,616	132,771	309,060
Portfolio Administration			84,616	46,429	19,438	19,438	169,921
Portfolio EM&V			84,616	177,130	195,121	227,175	684,042
Total	-	-	1,578,550	5,471,770	7,430,899	9,914,557	24,395,776

Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			3,720	1,861	712	712	7,005
Existing Affordable Multifamily Buildings			2,020	57,401	70,203	89,243	218,867
Affordable New Construction							
Customer Awareness, Outreach & Engagement							
Total	-	-	5,740	59,262	70,915	89,955	225,872

C.5 National Fuel Gas

The reported budgets below are based on National Fuel’s intent to fully utilize the approved funding. However, there are no Incentives or Services under the Affordable Multifamily Buildings during 2022, as there were no completed jobs. National Fuel Gas is anticipating projects to commence in late 2023 and anticipates reporting incentives and services.

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services	4,563,489	3,537,952	8,660,293	4,903,523	4,713,904	4,737,277	31,116,438
Program Implementation		368,180	349,163	896,606	872,295	875,292	3,361,536
Total Budget	4,563,489	3,906,132	9,009,456	5,800,129	5,586,200	5,612,569	34,477,974
Existing Affordable Multifamily Buildings							
Incentives & Services				405,841	502,378	568,953	1,477,172
Program Implementation			3,600	102,163	128,033	146,726	380,522
Total Budget			3,600	508,004	630,411	715,679	1,857,694
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services							
Program Implementation							
Total Budget							
Portfolio Administration				556,323	531,040	549,683	1,637,046
Portfolio EM&V				178,982	171,689	172,588	523,258
Total	4,563,489	3,906,132	9,013,056	7,043,437	6,919,339	7,050,518	38,495,972

Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes	31,411	22,093	47,420	47,169	50,789	55,526	254,408
Existing Affordable Multifamily Buildings				7,288	8,264	8,867	24,419
Affordable New Construction							
Customer Awareness, Outreach & Engagement							
Total	31,411	22,093	47,420	54,457	59,053	64,393	278,827

C.6 New York State Energy Research & Development Authority

As part of the Performance Management & Improvement Process established by DPS, NYSERDA revises the forecast of all CEF initiatives in the Compiled Investment Plans (CIP) November 1 filing annually (the reforecast). Each initiative's budget and benefit values have been updated to reflect NYSERDA's best understanding at this time, including actual progress reported for past years alongside adjustments to future year projections where necessary.⁹⁹

⁹⁹ <https://www.nyseda.ny.gov/About/Funding/Clean-Energy-Fund>

C.6.1 CEF Budget Expenditures

CEF Budget Distribution (\$000)												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes												
Incentives and Services	40,581	59,449	63,329	16,273	2,475	2,715						184,822
Implementation	6,560	7,356	8,717	7,482	725	546						31,385
Business Support			49	260	25	16						350
Tools, Training and Replication		8	20	13	225	206						473
Research and Technology Studies												
Total Budget	47,141	66,813	72,115	24,028	3,450	3,483						217,030
Existing Affordable Multifamily Buildings												
Incentives and Services	7,011	5,513	6,675	7,868	17,857	26,916	29,543	27,050	17,250	5,303		150,987
Implementation	2,317	2,045	1,447	1,762	2,090	2,533	2,328	1,890	520	76		17,008
Tools, Training and Replication	44	492	569	1,125	2,547	2,922	2,436	2,059	1,753			13,947
Research and Technology Studies			6	0								6
Total Budget	9,372	8,049	8,697	10,756	22,493	32,371	34,308	30,999	19,523	5,379		181,948
Affordable New Construction												
Incentives and Services	4,097	5,455	16,549	13,818	12,815	18,177	22,393	20,200	13,879	4,500	2,785	134,666
Implementation	726	773	754	555	287	267	100	100	62			3,624
Tools, Training and Replication	211	389	460	702	855	1,400	1,832	1,000	180			7,029
Total Budget	5,034	6,617	17,763	15,074	13,957	19,844	24,325	21,300	14,122	4,500	2,785	145,319
Customer Awareness, Outreach & Engagement												
Incentives and Services	156	471	378	156	1,054	1,606	549					4,369
Implementation	15	304	662	1,180	3,338	3,027	3,162					11,686
Tools, Training and Replication	25	55	1,624	3,128	12,172	13,922	8,276					39,202
Total Budget	195	829	2,664	4,464	16,563	18,555	11,986					55,257
Pilots and Demonstrations												
Implementation			469	384	398	398	398	398				2,444
Total Budget			469	384	398	398	398	398				2,444
LMI Solar												
Incentives and Services	1,093	821	812	1,300	1,248	1,200	1,200	1,163	1,100	1,100		11,037
Implementation	189	74	25	100	100	100	87					675
Total Budget	1,283	895	837	1,400	1,348	1,300	1,287	1,163	1,100	1,100		11,713
Electrification												
Incentives and Services		3,043	1,850	1,532	4,800	5,835	5,340	2,754	1,500			26,655
Implementation	13	789	313		256	249	210	314				2,143
Tools, Training and Replication		13	40									52
Research and Technology Studies					250	600	300					1,150
Total Budget	13	3,845	2,203	1,532	5,306	6,684	5,850	3,068	1,500			30,000
Heathly Homes VBP												
Incentives and Services		4	20	33	60	20						137
Implementation	56	81	11	79	85	53						365
Research and Technology Studies	865	200	498	1,833	4,015	1,911						9,322
Total Budget	921	285	530	1,945	4,160	1,983						9,825
Total Portfolio Budget	63,959	87,334	105,277	59,582	67,675	84,618	78,154	56,928	36,244	10,979	2,785	653,535

C.6.2 Electric Savings

Electric Savings Benefits Distribution (MWh)												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes	2,214	4,285	4,094	1,336	109	45						12,084
Existing Affordable Multifamily Buildings	2,961	11,278	6,816	3,264	7,100	14,260	14,949	25,441	2,152	863		89,083
Affordable New Construction	2,346	3,717	8,192	2,847	6,724	9,024	11,075	14,550	16,328	11,186	3,429	89,417
Customer Awareness, Outreach & Engagement Pilots and Demonstrations												
Healthy Homes VBP		0	1	59	180	60						301
Total	7,520	19,280	19,104	7,506	14,113	23,389	26,024	39,991	18,480	12,049	3,429	190,885

C.6.3 Gas Savings

Gas Savings Benefits Distribution (MMBtu)												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes	96,509	149,741	140,108	43,604	5,775	2,363						438,099
Existing Affordable Multifamily Buildings	33,652	62,306	35,172	153,904	190,352	255,152	297,498	737,466	373,820	214,080		2,353,402
Affordable New Construction	39,517	36,222	81,453	24,266	60,810	80,838	86,438	99,250	87,928	55,536	30,179	682,437
Customer Awareness, Outreach & Engagement Pilots and Demonstrations												
Healthy Homes VBP			0	1,640	4,920	1,640						8,200
Total	169,677	248,270	256,733	223,413	261,857	339,992	383,936	836,716	461,748	269,616	30,179	3,482,138

C.6.4 Other Fuels Saving

Other Fuels Distribution (MMBtu)												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing 1-4 Family Homes	52,785	74,236	74,575	21,258	3,537	1,447						227,837
Existing Affordable Multifamily Buildings	355	2,223	37,673	43,807	25,091	112,797	134,842	265,639	161,309	35,653		819,388
Affordable New Construction	1,945				1,590	1,763	2,063	3,250	4,785	3,107	1,036	19,539
Customer Awareness, Outreach & Engagement Pilots and Demonstrations												
Healthy Homes VBP			1	359	1,080	360						1,800
Total	55,084	76,459	112,249	65,424	31,297	116,367	136,905	268,889	166,094	38,760	1,036	1,068,564

C.6.5 Indirect Electric Savings

Indirect Electric Savings Benefits Distribution (MWh)*												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing Affordable Multifamily Buildings			982	3,842	4,020	5,033	8,657	9,037	9,870	11,899	13,790	67,131
Affordable New Construction		31,935	1,553	1,553	1,553	1,553	1,553	1,553	1,553	1,553	1,553	45,907
Healthy Homes VBP	96								2,429			28,000
Total	96	31,935	2,535	5,395	5,573	6,586	10,209	10,590	13,851	13,451	40,818	141,038

C.6.6 Indirect Gas Savings

Indirect Gas Savings Benefits Distribution (MMBtu)*												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing Affordable Multifamily Buildings			38,654	124,187	158,732	189,683	257,374	239,950	230,262	259,230	289,667	1,787,738
Affordable New Construction		283,441	8,363	8,363	8,363	8,363	8,363	8,363	8,363	8,363	8,363	358,703
Healthy Homes VBP	2,560								64,640			748,000
Total	2,560	283,441	47,016	132,549	167,095	198,045	265,737	248,313	303,264	267,592	978,830	2,894,441

C.6.7 Indirect Other Fuels Savings

Indirect Other Fuels Savings Benefits Distribution (MMBtu)*												
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Existing Affordable Multifamily Buildings			9,664	37,732	46,369	54,309	84,491	80,135	77,713	84,955	107,038	582,406
Affordable New Construction			387	387	387	387	387	387	387	387	387	3,483
Healthy Homes VBP	640								16,160			187,000
Total	640	-	10,051	38,119	46,756	54,696	84,878	80,522	94,260	85,342	277,625	772,889

C.7 New York State Electric & Gas (NYSEG)¹⁰⁰

Electric savings plans are projected to exceed ordered saving targets slightly below ordered budgets. Gas savings plans are projected to fall short of savings targets. This is due in part to misalignment of actual costs of the 1-4 family homes program compared to the targeted costs per savings in our orders (as described in section 3 of this plan). It should be noted that the actual costs of 1-4 family program appears to be in alignment with national costs/industry standard. The variance is also due to the low response rates to the AMEEP program. To offset those (savings) shortfalls we plan to bolster our Customer Awareness, Outreach and Engagement. These supplemental programs will cross promote Empower and AMEEP while providing additional savings to low-income consumers. This will help achieve targeted electric savings but will not meet the targeted gas savings.

¹⁰⁰ For NYSEG RG&E, spend in the “Program Implementation” and “Tools, Training, and Replication” categories of the tables below are reported in a combined “Program Implementation” category in NYSEG RG&E’s October 2023 SEEP.

Electric Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services	382,682	368,025	390,452	832,799	1,197,331	1,636,843	4,808,132
Program Implementation	51,610	38,558	67,013	10,524	15,130	20,685	203,519
Tools, Training, and Replication	2,087	1,987					4,074
Total Budget	436,380	408,569	457,464	843,323	1,212,462	1,657,528	5,015,726
Existing Affordable Multifamily Buildings							
Incentives & Services	405,309	21,708	73,158	369,915	441,828	641,478	1,953,396
Program Implementation	36,779	39,083	16,795	4,843	18,240	20,779	136,519
Tools, Training, and Replication	1,392	1,324	326				3,042
Total Budget	443,481	62,115	90,279	374,758	460,068	662,258	2,092,958
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services			358,945	797,386	310,026	423,830	1,890,186
Program Implementation			152,591	11,018	4,284	5,856	173,749
Tools, Training, and Replication			57,674				57,674
Total Budget			569,210	808,404	314,310	429,686	2,121,609
Portfolio Administration		24,229	48,545	77,136	41,297	56,456	247,663
Portfolio EM&V			53,069	117,840	95,032	96,604	362,545
Total	879,861	494,913	1,218,567	2,221,460	2,123,168	2,902,531	9,840,500

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services	46,651	637,378	983,982	2,916,356	2,826,005	3,863,365	11,273,737
Program Implementation	2,165	60,186	139,773	44,457	43,080	58,893	348,554
Tools, Training, and Replication	279	266					545
Total Budget	49,095	697,830	1,123,755	2,960,813	2,869,085	3,922,258	11,622,835
Existing Affordable Multifamily Buildings							
Incentives & Services	25,506	3,875	23,863	561,129	453,712	681,145	1,749,231
Program Implementation	3,025	50,227	39,567	38,832	43,200	36,911	211,763
Tools, Training, and Replication	186	177	1,271				1,634
Total Budget	28,717	54,280	64,701	599,962	496,912	718,056	1,962,628
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services			60,508	611,207	1,380,631	1,868,185	3,920,531
Program Implementation			35,930	31,733	26,766	36,591	131,019
Tools, Training, and Replication							
Total Budget			96,438	642,940	1,407,397	1,904,775	4,051,550
Portfolio Administration		33,332	113,366	59,596	57,143	87,765	351,203
Portfolio EM&V			37,785	109,348	123,522	139,721	410,375
Total	77,812	785,441	1,436,044	4,372,659	4,954,059	6,772,576	18,398,591

Electric Savings Benefit Distribution (MWh)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes	619	355	405	700	547	748	3,374
Existing Affordable Multifamily Buildings	817	44	178	900	2,138	2,923	7,000
Affordable New Construction							
Customer Awareness, Outreach & Engagement			7,328	5,619	920	1,257	15,124
Total	1,436	399	7,911	7,219	3,605	4,928	25,498

Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes	216	3,579	4,510	12,900	7,864	10,751	39,820
Existing Affordable Multifamily Buildings	672	33	800	3,200	6,925	9,467	21,097
Affordable New Construction							
Customer Awareness, Outreach & Engagement			3,902	10,200	10,498	14,352	38,952
Total	888	3,612	9,212	26,300	25,287	34,570	99,869

C.8 NMPC

The forecasted electric budgets and benefits below are based off the Company's plan to fully spend the allocated budgets to support LMI customers. Although there were challenges in ramping up the portfolio, the NMPC electric portfolio is currently forecasting to achieve the ordered energy savings target (MWh) and spend the ordered electric portfolio budget. The NMPC Gas portfolio, however, is not currently forecasted to reach the ordered energy savings (MMBtu) target due to significant challenges in ramping up the AMEEP program. To spend the full ordered gas budget, forecasted underspend from AMEEP has been re-allocated into the Existing 1-4 Family Homes program.

Electric Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			463,936	541,376	761,516	1,025,633	2,792,461
Program Implementation			59,277	69,407	97,630	131,491	357,805
Total Budget			523,213	610,783	859,146	1,157,124	3,150,266
Existing Affordable Multifamily Buildings							
Incentives & Services				672,308	1,000,000	1,222,000	2,894,308
Program Implementation				142,788	225,000	266,625	634,413
Total Budget				815,096	1,225,000	1,488,625	3,528,721
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services			369,870	225,293	450,000	399,576	1,444,739
Program Implementation			31,431	57,844	46,212	39,578	175,065
Total Budget			401,301	283,137	496,212	439,154	1,619,804
Portfolio Administration			53,879	62,966	88,367	118,842	324,054
Portfolio EM&V			17,934	68,387	84,581	106,331	277,233
Total	-	-	996,327	1,840,369	2,753,306	3,310,076	8,900,078

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			1,001,802	1,108,459	3,958,500	5,042,684	11,111,445
Program Implementation			94,186	188,351	537,500	676,498	1,496,535
Total Budget			1,095,988	1,296,810	4,496,000	5,719,182	12,607,980
Existing Affordable Multifamily Buildings							
Incentives & Services				248,952	1,500,000	3,000,000	4,748,952
Program Implementation				71,679	331,250	612,500	1,015,429
Total Budget				320,631	1,831,250	3,612,500	5,764,381
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services				-	-	-	
Program Implementation			75,957	47,902	35,902	129,699	289,460
Total Budget			75,957	47,902	35,902	129,699	289,460
Portfolio Administration			94,186	129,960	457,150	582,248	1,263,544
Portfolio EM&V			94,186	131,094	275,829	340,376	841,485
Total	-	-	1,360,317	1,926,397	7,096,131	10,384,005	20,766,850

Electric Savings Benefit Distribution (MWh)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			381	295	511	688	1,875
Existing Affordable Multifamily Buildings				1,317	1,938	2,345	5,600
Affordable New Construction							
Customer Awareness, Outreach & Engagement			7,604	1,040	2,077	1,490	12,211
Total	-	-	7,985	2,652	4,526	4,523	19,686

Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			2,924	3,959	13,046	16,619	36,548
Existing Affordable Multifamily Buildings				3,036	18,293	36,585	57,914
Affordable New Construction							
Customer Awareness, Outreach & Engagement							
Total	-	-	2,924	6,995	31,339	53,204	94,462

C.9 Orange & Rockland

Forecasted budgets and benefits for O&R are directed towards the goal of fully investing the allocated budgets to support LMI customers. The Company expects the majority of LMI participation to be in the 1-4 Family Homes sector, so therefore 87% of the electric budget and 94% of the gas budget have been allocated towards the EmPower+ NY program. However, due to the high YTD run rate of the EmPower program, we are expecting some difficulty in achieving our LMI gas savings target. In addition, the Federal EISA regulations will have further impacts on reducing the energy savings potential per project starting in 2023. Therefore, the Company will look to expand its efforts on its lower cost Customer Awareness, Outreach, and Engagement programs in order to attempt to meet its overall LMI savings targets. These Customer Awareness, Outreach and Engagement initiatives will engage and guide LMI customers to make energy-wise decisions for their homes.

Electric Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			1,060,000	800,000	600,000	600,000	3,060,000
Program Implementation							
Total Budget			1,060,000	800,000	600,000	600,000	3,060,000
Existing Affordable Multifamily Buildings							
Incentives & Services				17,563	20,000	20,000	57,563
Program Implementation				8,000	8,000	8,000	24,000
Total Budget				25,563	28,000	28,000	81,563
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services			59,169	60,000	60,000	60,000	239,169
Program Implementation			16,490	20,000	20,000	20,000	76,490
Total Budget			75,659	80,000	80,000	80,000	315,659
Portfolio Administration			19,437	10,000	10,000	10,000	49,437
Portfolio EM&V				5,000	5,000	5,000	15,000
Total	-	-	1,155,096	920,563	723,000	723,000	3,521,659

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services			2,672,000	616,067	1,250,000	1,250,000	5,788,067
Program Implementation							
Total Budget			2,672,000	616,067	1,250,000	1,250,000	5,788,067
Existing Affordable Multifamily Buildings							
Incentives & Services				98,955	90,000	90,000	278,955
Program Implementation				25,000	25,000	25,000	75,000
Total Budget				123,955	115,000	115,000	353,955
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services			330	4,882	4,500	4,500	14,212
Program Implementation			-	500	500	500	1,500
Total Budget			330	5,382	5,000	5,000	15,712
Portfolio Administration			9,419	9,549	10,000	10,000	38,968
Portfolio EM&V				5,000	5,000	5,000	15,000
Total	-	-	2,681,749	759,953	1,385,000	1,385,000	6,211,702

Electric Savings Benefit Distribution (MWh)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			160	317	154	154	785
Existing Affordable Multifamily Buildings				18	20	20	58
Affordable New Construction							
Customer Awareness, Outreach & Engagement			1,154	1,196	1,187	1,186	4,723
Total	-	-	1,314	1,531	1,361	1,360	5,566

Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes			2,688	3,884	2,898	2,898	12,367
Existing Affordable Multifamily Buildings				434	403	403	1,239
Affordable New Construction							-
Customer Awareness, Outreach & Engagement				290	336	336	962
Total	-	-	2,688	4,608	3,637	3,637	14,568

C.10 Rochester Gas & Electric (RG&E)¹⁰¹

Electric savings plans are projected to exceed ordered saving targets slightly below ordered budgets. Gas savings plans are projected to fall short of savings targets. This is due in part to misalignment of actual costs of the 1-4 family homes program compared to the targeted costs per savings in our orders (as described in section 3 of this plan). It should be noted that the actual costs of 1-4 family program appears to be in alignment with national costs/industry standard. The variance is also due to the low response rates to the AMEEP program. To offset those (savings) shortfalls we plan to bolster our Customer Awareness, Outreach and Engagement. These supplemental programs will cross promote Empower and AMEEP while providing additional savings to low-income consumers. This will help achieve targeted electric savings but will not meet the targeted gas savings.

¹⁰¹ For NYSEG RG&E, spend in the “Program Implementation” and “Tools, Training, and Replication” categories of the tables below are reported in a combined “Program Implementation” category in NYSEG RG&E’s October 2023 SEEP.

Electric Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services	199,277	227,407	189,237	415,993	579,248	750,651	2,361,813
Program Implementation	27,270	25,639	40,453	5,257	7,320	9,486	115,424
Tools, Training, and Replication	1,559	1,499	(0)				3,058
Total Budget	228,106	254,544	229,690	421,250	586,568	760,136	2,480,295
Existing Affordable Multifamily Buildings							
Incentives & Services	256,456	73,013	100,359	202,880	208,162	285,749	1,126,619
Program Implementation	18,180	38,041	9,293	2,656	10,559	10,948	89,677
Tools, Training, and Replication	1,040	999	(0)				2,039
Total Budget	275,676	112,053	109,652	205,536	218,721	296,697	1,218,335
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services			181,042	418,013	154,650	200,411	954,116
Program Implementation			57,430	5,776	2,137	2,769	68,111
Tools, Training, and Replication			38,431				38,431
Total Budget			276,903	423,789	156,787	203,180	1,060,659
Portfolio Administration		15,181	27,397	40,429	20,229	26,215	129,451
Portfolio EM&V			24,045	61,526	44,846	44,861	175,278
Total	503,782	381,778	667,687	1,152,530	1,027,151	1,331,090	5,064,018

Gas Budget Distribution (\$)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes							
Incentives & Services	19,183	370,104	538,548	1,457,218	1,367,172	1,771,724	5,523,949
Program Implementation	1,775	36,417	80,566	22,214	20,841	27,008	188,821
Tools, Training, and Replication	105	100					205
Total Budget	21,062	406,621	619,114	1,479,432	1,388,013	1,798,732	5,712,975
Existing Affordable Multifamily Buildings							
Incentives & Services	29,846	57,516	91,315	421,516	463,772	623,005	1,686,970
Program Implementation	1,183	41,789	23,562	6,330	24,000	24,881	121,747
Tools, Training, and Replication	70	67					137
Total Budget	31,099	99,373	114,877	427,847	487,772	647,887	1,808,854
Affordable New Construction							
Incentives & Services							
Program Implementation							
Total Budget							
Customer Awareness, Outreach & Engagement							
Incentives & Services			36,269	277,699	434,879	556,645	1,305,492
Program Implementation			11,737	19,546	8,431	10,925	50,639
Tools, Training, and Replication							
Total Budget			48,005	297,245	443,309	567,571	1,356,131
Portfolio Administration		19,121	62,150	25,491	22,901	33,144	162,806
Portfolio EM&V			20,714	54,129	54,691	58,543	188,077
Total	52,161	525,114	864,860	2,284,143	2,396,687	3,105,876	9,228,842

Electric Savings Benefit Distribution (MWh)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes	452	381	284	300	298	386	2,101
Existing Affordable Multifamily Buildings	524	47	428	700	1,474	1,910	5,083
Affordable New Construction							
Customer Awareness, Outreach & Engagement			3,345	3,100	490	634	7,569
Total	976	428	4,057	4,100	2,262	2,930	14,753

Gas Savings Benefit Distribution (MMBtu)							
	2020	2021	2022	2023	2024	2025	Total
Existing 1-4 Family Homes	296	2,143	2,720	6,000	4,097	5,309	20,565
Existing Affordable Multifamily Buildings	673		3,050	4,900	4,692	6,080	19,395
Affordable New Construction							
Customer Awareness, Outreach & Engagement			789	4,900	4,401	5,703	15,793
Total	969	2,143	6,559	15,800	13,190	17,092	55,753

Appendix D: Budgets, Benefits, and Metrics by Sector

D.1 Existing 1-4 Family Homes

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	53,970	73,892	96,328	49,342	31,614	32,435						291,657
Additional Utility Funding* (\$000)												45,924
MWh Annual	3,285	5,021	5,493	3,119	1,978	2,548						21,445
MWh Lifetime	51,370	76,619	84,152	49,570	32,527	42,220						336,457
MMBtu Annual	184,765	259,541	301,792	173,257	116,833	121,487						1,157,675
MMBtu Lifetime	4,472,709	6,346,173	7,164,408	3,882,392	2,452,248	2,535,697						26,853,627
Participants	13,065	18,270	18,642	10,509	7,426	8,606						76,518
Leveraged Funds (\$000)	14,086	29,525	19,002	3,179								65,792

D.2 Existing Affordable Multifamily Buildings

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	17,732	24,819	34,243	53,310	70,453	87,152	34,308	30,999	19,523	5,379		377,563
Additional Utility Funding* (\$000)												355
Direct MWh Annual	8,238	15,200	12,066	10,678	17,623	26,706	14,949	25,441	2,152	863		133,916
Direct MWh Lifetime	126,554	229,472	181,176	163,140	266,187	406,585	225,304	382,298	32,287	12,945		2,025,948
Indirect MWh Annual			982	3,842	4,020	5,033	8,657	9,037	9,870	11,899	13,790	67,131
Indirect MWh Lifetime			14,998	48,674	51,344	68,278	121,849	133,900	154,908	196,031	233,993	1,023,974
Direct MMBtu Annual	97,702	266,732	322,357	464,658	517,844	718,245	432,340	1,003,105	535,128	249,733		4,607,844
Direct MMBtu Lifetime	1,688,874	4,740,984	5,763,576	7,111,287	8,329,482	11,511,144	6,504,292	15,058,780	8,026,927	3,745,995		72,481,341
Indirect MMBtu Annual			48,317	161,919	205,101	243,992	341,866	320,086	307,975	344,185	396,705	2,370,143
Indirect MMBtu Lifetime			724,755	1,983,075	2,630,805	3,236,670	4,872,086	4,659,183	4,630,213	5,364,963	6,316,985	34,418,734
Participants	3,808	9,844	77,822	98,272	105,478	115,664	11,211	2,598	60	60		424,817
Leveraged Funds (\$000)	18,643	33,690	60,944	53,216	379,057	367,866	321,115	395,006	4,000			1,633,538

D.3 Affordable New Construction

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	5,034	6,617	17,763	15,074	13,957	19,844	24,325	21,300	14,122	4,500	2,785	145,319
Direct MWh Annual	2,346	3,717	8,192	2,847	6,724	9,024	11,075	14,550	16,328	11,186	3,429	89,417
Direct MWh Lifetime	50,069	88,147	178,682	69,700	151,600	214,205	276,875	363,750	408,200	279,650	85,725	2,166,603
Indirect MWh Annual		31,935	1,553	1,553	1,553	1,553	1,553	1,553	1,553	1,553	1,553	45,907
Indirect MWh Lifetime		798,374	38,813	38,813	38,813	38,813	38,813	38,813	38,812	38,813	38,813	1,147,687
Direct MMBtu Annual	41,462	36,222	81,453	24,266	62,400	82,601	88,501	102,500	92,713	58,643	31,215	701,976
Direct MMBtu Lifetime	965,512	860,283	1,805,154	592,685	1,415,000	1,987,025	2,212,525	2,562,500	2,317,825	1,466,075	780,375	16,964,959
Indirect MMBtu Annual		283,441	8,750	8,750	8,750	8,750	8,750	8,750	8,750	8,750	8,750	362,186
Indirect MMBtu Lifetime		7,086,024	218,738	218,738	218,738	218,738	218,738	218,737	218,738	218,738	218,738	9,054,662
Participants	1,922	3,068	4,536	1,481	4,245	4,087	4,825	5,933	5,715	3,393	964	40,169
Leveraged Funds (\$000)	7,388	11,869	25,730	6,393	20,850	21,725	24,375	23,500	15,857	11,429	6,000	175,116

D.4 Customer Awareness, Outreach, and Engagement

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	3,225	1,029	5,074	9,372	21,109	24,198	11,986					75,992
MWh Annual	34,594	9,317	30,037	22,521	11,598	11,491						119,557
MWh Lifetime	468,604	126,202	420,727	308,540	161,572	159,294						1,644,938
MMBtu Annual	32,374	370	5,981	31,223	33,223	38,379						141,549
MMBtu Lifetime	323,736	3,703	59,808	295,856	331,991	383,551						1,398,645
Participants	501,558	66,682	261,687	204,122	227,111	204,867						1,466,027
Leveraged Funds (\$000)	2,028	1,028										3,056

D.5 Pilots and Demonstrations

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)			469	384	398	398	398	398				2,444
MWh Annual												-
MWh Lifetime												-
MMBtu Annual												-
MMBtu Lifetime												-
Participants												-
Leveraged Funds (\$000)												-

D. 6 NYS Healthy Homes VBP

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	921	285	530	1,945	4,160	1,983						9,825
Direct MWh Annual		0	1	59	180	60						301
Direct MWh Lifetime		6	19	826	2,520	840						4,212
Indirect MWh Annual	96								2,429		25,475	28,000
Indirect MWh Lifetime	1,344								34,006		356,650	392,000
Direct MMBtu Annual			2	1,999	6,000	2,000						10,001
Direct MMBtu Lifetime			41	39,980	120,000	40,000						200,021
Indirect MMBtu Annual	3,200								80,800		851,000	935,000
Indirect MMBtu Lifetime	64,000								1,616,000		17,020,000	18,700,000
Participants		1	3	97	300	100						501
Leveraged Funds (\$000)												-

D.7 Beneficial Electrification¹⁰²

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	13	3,845	2,203	1,532	5,306	6,684	5,850	3,068	1,500			30,000
MWh Annual												-
MWh Lifetime												-
MMBtu Annual												-
MMBtu Lifetime												-
Participants												-
Leveraged Funds												-

¹⁰² At the time of this filing, the Beneficial Electrification activities are currently being planned. Projected savings, participants, leveraged funds, and participant bill savings will be incorporated in an updated future filing of the Implementation Plan.

D.8 LMI Solar¹⁰³

Metric	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Total Budget Spend (\$000)	1,283	895	837	1,400	1,348	1,300	1,287	1,163	1,100	1,100		11,713
MWh Annual												-
MWh Lifetime												-
MMBtu Annual												-
MMBtu Lifetime												-
Participants												-
Leveraged Funds												-

¹⁰³ The total budget for Solar for All is \$21,245,000. However, \$8,723,237 is uncommitted in the CEF LMI Chapter and is being carried forward into the Statewide LMI Portfolio Implementation Plan. Metrics for LMI Solar are included and reported through NY-Sun.

Appendix E: Preliminary BCA Results by Program Administrator

The table below lists the benefits and costs considered in calculating benefit/cost ratios for the Statewide LMI Portfolio.¹⁰⁴

Type	Component
Costs	Measure equipment and installation (labor) costs
	Program administrator costs (program administration, including marketing, implementation contractor, and EM&V)
Benefits	Avoided energy costs
	Deferred capacity costs (generation, transmission, and distribution)
	Reduced CO ₂ emissions

The following tables report preliminary BCA results by Program Administrator.

E.1 Central Hudson

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$385,231	\$348,634	1.10	\$210,688	\$648,236	0.33
2024	\$238,481	\$403,715	0.59	\$120,092	\$596,874	0.20
2025	\$386,250	\$491,247	0.79	\$248,123	\$716,380	0.35

¹⁰⁴ While the Program Administrators provided an updated BCA in 2022 (*i.e.*, NE: NY Proceeding, Statewide Low- to Moderate-Income Portfolio Implementation Plan, Version 2 (filed April 29, 2022)), a new BCA was not conducted for the Nov. 1, 2022 filing or May 1, 2023. A new BCA will be conducted in conjunction with the next annual Implementation Plan to be filed, scheduled for filing in the fall of 2023.

E.2 Con Edison

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$59,592,870	\$69,119,652	0.86	\$32,809,143	\$39,034,662	0.84
2024	\$57,779,099	\$73,107,739	0.79	\$32,774,792	\$40,474,076	0.81
2025	\$60,381,789	\$76,679,330	0.79	\$34,586,774	\$41,907,063	0.83

E.3 National Grid (KEDLI)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$10,114,843	\$14,536,418	0.70	\$5,670,778	\$10,028,798	0.57
2024	\$8,632,540	\$11,427,087	0.76	\$4,851,208	\$7,984,019	0.61
2025	\$8,639,929	\$11,078,365	0.78	\$4,860,509	\$7,996,248	0.61

E.4 National Grid (KEDNY)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$9,744,671	\$7,049,921	1.38	\$5,422,284	\$5,718,677	0.95
2024	\$12,104,539	\$9,747,070	1.24	\$6,711,520	\$7,604,535	0.88
2025	\$15,775,948	\$12,914,735	1.22	\$8,764,849	\$10,184,202	0.86

E.5 National Fuel Gas

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$4,361,018	\$8,786,099	0.50	\$2,003,157	\$8,282,560	0.24
2024	\$4,207,951	\$8,212,437	0.51	\$1,946,840	\$7,599,297	0.26
2025	\$4,303,250	\$8,372,394	0.51	\$2,000,052	\$7,709,333	0.26

E.6 New York State Energy Research & Development Authority

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$100,353,799	\$81,808,346	1.23	\$66,730,149	\$74,965,346	0.89
2024	\$136,736,092	\$812,697,718	0.17	\$90,338,129	\$113,931,656	0.79
2025	\$174,272,149	\$416,114,247	0.42	\$115,196,022	\$125,495,436	0.92
2026	\$190,877,364	\$384,282,625	0.50	\$139,501,405	\$91,149,186	1.53
2027	\$61,953,295	\$40,327,163	1.54	\$44,516,824	\$31,846,163	1.40
2028	\$57,627,818	\$21,008,031	2.74	\$41,479,468	\$19,029,764	2.18
2029	\$34,372,668	\$11,653,265	2.95	\$24,835,996	\$4,724,694	5.26

E.7 New York State Electric & Gas (NYSEG)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$2,177,967	\$5,607,606	0.39	\$907,483	\$5,335,736	0.17
2024	\$5,032,373	\$7,056,698	0.71	\$2,052,429	\$6,527,886	0.31
2025	\$6,512,136	\$9,491,561	0.69	\$2,724,027	\$8,832,374	0.31

E.8 National Grid (NMPC)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$5,417,663	\$3,388,344	1.60	\$2,188,908	\$3,651,196	0.60
2024	\$12,408,543	\$8,062,706	1.54	\$5,187,360	\$9,326,717	0.56
2025	\$15,305,099	\$11,910,156	1.29	\$6,600,653	\$13,153,803	0.50

E.9 Orange & Rockland

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$2,494,378	\$1,830,063	1.36	\$1,051,891	\$1,825,183	0.58
2024	\$1,448,449	\$2,233,581	0.65	\$747,917	\$2,229,655	0.34
2025	\$1,464,985	\$2,245,168	0.65	\$757,379	\$2,242,105	0.34

E.10 Rochester Gas & Electric (RG&E)

	SCT			UCT		
	Benefits	Costs	Benefit Cost Ratio	Benefits	Costs	Benefit Cost Ratio
2023	\$2,077,730	\$3,074,036	0.65	\$756,104	\$2,909,177	0.26
2024	\$2,266,348	\$3,201,516	0.71	\$889,686	\$2,872,947	0.31
2025	\$2,857,045	\$3,963,279	0.72	\$1,144,353	\$3,655,460	0.31

Appendix F: Implementation Milestones

This Appendix provides additional detail regarding the milestones provided in the 2020 Plan and this Plan. The tables below have two milestone columns to indicate whether a milestone is from the 2020 Plan or is new or updated in this Plan. The third column provides the Status as of the filing of this Plan. Additional information on the progress of meeting milestones to date is provided in Annual Reports. For example, the 2021 Annual Report provides additional detail on progress made in 2021 towards the milestones from 2020 and 2021 as laid out in the 2020 Implementation Plan.¹⁰⁵ Any milestone with the status “Delayed” or “No Longer Applicable” has its status explained in more detail below its respective milestone table.

F.1 1-4 Family Homes

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan ¹⁰⁶	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020	<ul style="list-style-type: none"> Redesign of current set of initiatives to better align utility and NYSERDA offers, improve customer experience by reducing administrative burden, and developing a more graduated scale of financial support 			Complete
	<ul style="list-style-type: none"> Stakeholder engagement to inform redesign of programs 			Complete
	<ul style="list-style-type: none"> Test a model geographic-based eligibility and determine how it can be applied to 			Complete

¹⁰⁵ NE: NY Proceeding, 2021 Annual Report.

¹⁰⁶ Most milestones included in the “Milestone Added or Updated in a 2022 revision to the Implementation Plan” column throughout Appendix F were updated or added in the April 29, 2022, Implementation Plan filing. Some were added or further updated in the November 1, 2022, filing. Where a milestone was added or further updated in the November 1 filing, it is indicated by an explanatory footnote.

	programs going forward			
2021	<ul style="list-style-type: none"> Launch of redesigned programs (<i>milestone moved from 2021 to 2023</i>) 			Delayed
	<ul style="list-style-type: none"> Ongoing stakeholder engagement and coordination with other programs (<i>e.g., HEAP and WAP</i>) 			No Longer Applicable
2022	<ul style="list-style-type: none"> Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities 			No Longer Applicable
	<ul style="list-style-type: none"> Ongoing stakeholder engagement and coordination with other programs (<i>e.g., HEAP and WAP</i>) 	<ul style="list-style-type: none"> Improve coordination with other programs (<i>e.g., HEAP and WAP</i>) 		No Longer Applicable
		<ul style="list-style-type: none"> Enhance effectiveness of the EmPower referral process and improve customer conversion rate by conforming to consistent data file submission to NYSERDA 		Complete
		<ul style="list-style-type: none"> Identify ways to enhance or add measures to the existing EmPower 		Delayed

		offerings, particularly for gas savings (<i>milestone moved from 2022 to 2024</i>)		
		<ul style="list-style-type: none"> Contract for new program workflow software and implementation support services 		Complete
		<ul style="list-style-type: none"> Work with NYS Clean Heat JMC to streamline customer access to both NYS Clean Heat and EmPower with appropriate affordability protections 		No Longer Applicable
		<ul style="list-style-type: none"> Outline and seek input on a plan to phase out support for fossil fuel fired equipped in GJGNY audits, financing, and LMI programs to align with Climate Act while preserving energy affordability (<i>milestone moved from 2022 to 2023</i>) 		Delayed
		<ul style="list-style-type: none"> Increase awareness, community outreach and education through coordination with the new Clean Energy Hubs and existing utility outreach programs. 	<ul style="list-style-type: none"> Facilitate coordination between the new Clean Energy Hubs and existing utility outreach programs 	Complete
			<ul style="list-style-type: none"> Increase awareness, community outreach and education 	Delayed

			through coordination between the Clean Energy Hubs and utility outreach programs (<i>milestone moved from 2022 to 2024</i>)	
2023	<ul style="list-style-type: none"> Launch of redesigned programs (<i>milestone moved to 2023 from 2021</i>) 	<ul style="list-style-type: none"> Launch the combined, streamlined LMI program: EmPower+ 		Complete
		<ul style="list-style-type: none"> Integrate EmPower+ and NYS Clean Heat offerings to increase access to incentives for electrification 		No Longer Applicable
		<ul style="list-style-type: none"> Pursue opportunities to obtain and incorporate funding from the Inflation Reduction Act into LMI programs¹⁰⁷ (<i>milestone moved from 2023 to 2024</i>) 		Delayed
		<ul style="list-style-type: none"> Increase DAC access to EmPower+ by incorporating DAC geographic eligibility and coordinating with regional Clean Energy Hubs on targeted outreach to DACs 	<ul style="list-style-type: none"> Increase DAC access to EmPower+ by incorporating DAC geographic eligibility 	Complete
			<ul style="list-style-type: none"> Increase DAC access to EmPower+ by coordinating with regional Clean Energy Hubs on targeted 	Delayed

¹⁰⁷ Milestone added in the November 1, 2022, Implementation Plan filing.

			outreach to DACs (<i>milestone moved from 2023 to 2024</i>)	
			<ul style="list-style-type: none"> Outline and seek input on a plan to phase out support for fossil fuel fired equipment in GJGNY audits, financing, and LMI programs to align with Climate Act while preserving energy affordability (<i>milestone moved to 2023 from 2022</i>) 	In Progress
2024		<ul style="list-style-type: none"> Evaluate program performance and optimize design to serve more homes and encourage more contractors to offer efficiency and electrification services through the program 		Planning
		<ul style="list-style-type: none"> Increase contractor base and expand offerings to meet increased climate goals 		Planning
			<ul style="list-style-type: none"> Identify ways to enhance or add measures to the existing EmPower offerings, particularly for gas savings 	Planning

			<i>(milestone moved to 2024 from 2022)</i>	
			<ul style="list-style-type: none"> Increase awareness, community outreach and education through coordination between the Clean Energy Hubs and utility outreach programs <i>(milestone moved to 2024 from 2022)</i> 	Planning
			<ul style="list-style-type: none"> Increase DAC access to EmPower+ by coordinating with regional Clean Energy Hubs on targeted outreach to DACs <i>(milestone moved to 2024 from 2023)</i> 	Planning
			<ul style="list-style-type: none"> Pursue opportunities to obtain and incorporate funding from the Inflation Reduction Act into LMI programs <i>(milestone moved to 2024 from 2023)</i> 	Planning
2025			<ul style="list-style-type: none"> Continue to integrate funding 	Future

			from the IRA to increase adoption of beneficial electrification	
			<ul style="list-style-type: none"> • Prepare for the expansion of EmPower+ in NYC/Long Island area 	Future
			<ul style="list-style-type: none"> • Integrate a dynamic customer program interface to aid in outreach to LMI homes 	Future

Milestones marked as “Delayed” or “No Longer Applicable”

The “Launch of redesigned programs” milestone originally included for 2021 in the 2020 Implementation Plan is marked as “Delayed” in this Implementation Plan due to unforeseen unavailability of program management software and the need to procure new program workflow software and implementation support services to operate EmPower+. It is anticipated that new software and implementation support will be acquired and operational by 2023. Therefore, a new milestone for the “Launch of the combined, streamlined LMI program: EmPower+” has been added for 2023.

The “Ongoing stakeholder engagement and coordination with other programs (e.g., HEAP and WAP)” and “Improve coordination with other programs (e.g., HEAP and WAP)” milestones originally included for 2021 and 2022 in the 2020 and 2022 Implementation Plans are marked as “No Longer Applicable” because they are now considered to be ongoing objectives for 1-4 Family Homes programs, and thus not appropriate milestones for individual program years.

The “Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities” milestone originally included for 2022 in the 2020 Implementation Plan is marked as “No Longer Applicable” because it has been replaced with more specific and actionable milestones, such as the “Increase DAC access to EmPower by incorporating geographic eligibility and coordinating with regional Clean Energy Hubs on targeted outreach to DACs” milestone and the “Work with NYS Clean Heat JMC to streamline customer access to both NYS Clean Heat and EmPower with appropriate affordability protections” milestone.

The “Identify ways to enhance or add measures to the existing EmPower offerings, particularly for gas savings” milestone originally included for 2022 in the 2022 Implementation Plan is marked as “Delayed” because Program Administrators plan to consider ways to enhance or add EmPower measures in 2024.

The “Work with NYS Clean Heat JMC to streamline customer access to both NYS Clean Heat and EmPower with appropriate affordability protections” milestone originally included for 2022 in the 2022 Implementation Plan is marked as “No Longer Applicable,” which reflects the present strategic priorities of the LMI Portfolio.

The “Outline and seek input on a plan to phase out support for fossil fuel fired equipped in GJGNY audits, financing, and LMI programs to align with Climate Act while preserving energy affordability” milestone originally included for 2022 in the 2022 Implementation Plan is marked as “Delayed” because it is currently in progress in 2023.

The “Increase awareness, community outreach and education through coordination with the new Clean Energy Hubs and existing utility outreach programs” milestone originally included for 2022 in the 2022 Implementation Plan has been replaced with two milestones in the 2023 Implementation Plan. While Program Administrators facilitated coordination between the Clean Energy Hubs and existing utility outreach programs in 2023, Program Administrators plan to leverage this strategic partnership to increase awareness, community outreach, and education starting in 2024.

The “Integrate EmPower+ and NYS Clean Heat offerings to increase access to incentives for electrification” originally included for 2023 in the 2022 Implementation Plan is marked as “No Longer Applicable,” which reflects the present strategic priorities of the LMI Portfolio.

The “Pursue opportunities to obtain and incorporate funding from the Inflation Reduction Act into LMI programs” milestone originally included for 2023 in the 2022 Implementation Plan is marked as “Delayed,” as Program Administrators plan to achieve this milestone in 2024.

The “Increase DAC access to EmPower+ by incorporating DAC geographic eligibility and coordinating with regional Clean Energy Hubs on targeted outreach to DACs” originally included for 2023 in the 2022 Implementation Plan has been divided into two milestones in the 2023 Implementation Plan. The first milestone, “Increase DAC access to EmPower+ by incorporating DAC geographic eligibility,” is complete as of 2023. The second milestone, “Increase DAC access to EmPower+ by coordinating with regional Clean Energy Hubs on targeted outreach to DACs” is marked as “Delayed” as it is now targeted for completion in 2024.

F.2 Affordable Multifamily Energy Efficiency Program

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020	<ul style="list-style-type: none"> Determine implementation structure and coordination among Program Administrators 			Complete
	<ul style="list-style-type: none"> Develop a consistent framework for an incentive program that promotes comprehensive upgrades but allows flexibility for prescriptive upgrades 			Complete
	<ul style="list-style-type: none"> Develop process to coordinate technical assistance with incentive-based program 			Complete
2021	<ul style="list-style-type: none"> Launch consistent statewide framework for incentive-based program 			Complete
	<ul style="list-style-type: none"> Identify additional areas to streamline administration of program (<i>milestone moved from 2021 to 2022</i>) 			Delayed
2022	<ul style="list-style-type: none"> Identify additional areas to streamline administration of program (<i>milestone moved to 2022 from 2021</i>) 			No Longer Applicable

	<ul style="list-style-type: none"> Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities <i>(milestone moved from 2022 to 2023)</i> 			Delayed
	<ul style="list-style-type: none"> Ongoing stakeholder engagement and coordination with other programs (e.g., NYS HCR, NYC HPD and housing agencies) 	<ul style="list-style-type: none"> Develop Program Administrator processes for statewide operations of AMEEP (e.g., document updates) and launch webinar series to engage Participating Contractors and Industry Partners by Q2 		Complete ¹⁰⁸
		<ul style="list-style-type: none"> Coordinate AMEEP incentives with NYS Clean Heat and align release to market with NYS Clean Heat announcement cycles for program changes 		No Longer Applicable
2023	<ul style="list-style-type: none"> Calibration of programs, where necessary, to improve impact and reach underserved or otherwise 	<ul style="list-style-type: none"> Organize stakeholder interviews on AMEEP design and operations based on the first full year of 		Complete ¹⁰⁹

¹⁰⁸ Status updated from “In Progress” in the April 29, 2022, Implementation Plan filing to “Complete” in the November 1, 2022, Implementation Plan filing.

¹⁰⁹ The Program Administrators held an AMEEP Roundtable in August 2023 to collect stakeholder feedback regarding AMEEP design and operations. Adapting AMEEP eligibility to reflect final DAC criteria is an ongoing objective for the LMI Portfolio.

	disadvantaged communities <i>(milestone moved from 2022 to 2023)</i>	operation to get feedback to guide analysis and potential program changes, and adapt program eligibility to reflect final DAC criteria		
		<ul style="list-style-type: none"> Review program objectives and operations to enable alignment with potential policy changes scheduled to take place in 2022 and 2023 (e.g., NE: NY mid-point review, Climate Act definition of providing benefits to DACs) <i>(milestone moved from 2023 to 2024)</i> 		Delayed
2024		<ul style="list-style-type: none"> Study creation of measure packages for comprehensive retrofits by building typology based on data from AMEEP participants, and assess ability to offer packages as part of AMEEP 		In Progress
			<ul style="list-style-type: none"> Review program objectives and operations to enable alignment with potential policy changes scheduled to take 	Planning ¹¹⁰

¹¹⁰ The Program Administrators note that achievement of this milestone may be realized in 2025.

			place in 2022 and 2023 (e.g., NE: NY mid-point review, Climate Act definition of providing benefits to DACs) (milestone moved to 2024 from 2023)	
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Milestones marked as “Delayed” or “No Longer Applicable”

The “Identify additional areas to streamline administration of program” milestone originally included for 2021 in the 2020 Implementation Plan was moved to 2022 in the 2022 Implementation Plan because AMEEP was launched in late 2021 and the Program Administrators sought to observe AMEEP in-market into order to best identify potential administrative streamlining opportunities. Now that AMEEP has been in-market for two years, the Program Administrators consider streamlining administration of the program to be an ongoing objective, and thus not an appropriate milestone for an individual program year. It has therefore been marked as “No Longer Applicable” in the 2023 Implementation Plan.

The “Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities” milestone originally included for 2022 in the 2020 Implementation Plan was moved to 2023, and the language was refined to “Organize stakeholder interviews on AMEEP design and operations based on the first full year of operation to get feedback to guide analysis and potential program changes” in the 2022 Implementation Plan to make the milestone more actionable.

The “Ongoing stakeholder engagement and coordination with other programs (e.g., NYS HCR, NYC HPD and housing agencies)” milestone was replaced with the “Develop Program Administrator processes for statewide operations of AMEEP and launch webinar series to engage Participating Contractors and Industry Partners by Q2” milestone in 2022, which is more specific and actionable.

The “Coordinate AMEEP incentives with NYS Clean Heat and align release to market with NYS Clean Heat announcement cycles for program changes” milestone originally included for 2022 in the 2022 Implementation Plan is marked as “No Longer Applicable,” which reflects the present strategic priorities of the LMI Portfolio.

The “Review program objectives and operations to enable alignment with potential policy changes scheduled to take place in 2022 and 2023” milestone has been moved to 2024 and may extend into 2025, given ongoing policy changes and dialogue.

F.3 Multi-Year Affordable Housing Partnerships¹¹¹

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020	<ul style="list-style-type: none"> Work with housing agencies to develop an approach to directly incorporate program incentives into the capital stack for affordable multifamily buildings that are being refinanced 			Complete
2021	<ul style="list-style-type: none"> Launch approach to working with housing agencies 			Complete
2022	<ul style="list-style-type: none"> Ongoing stakeholder engagement and coordination with other programs (e.g., NYS HCR, NYC HPD and housing agencies) 	<ul style="list-style-type: none"> Expand direct funding partnership between NYSEDA and NYS HCR to serve affordable housing new construction and preservation 		Complete
		<ul style="list-style-type: none"> NYSEDA to support housing agencies in development of sustainability/design guidelines for efficient, all-electric new construction and retrofit projects 		Complete
		<ul style="list-style-type: none"> Issue Clean Heat for All packaged window heat pump RFP through partnership 		Complete

¹¹¹ 2020-2022 milestones in Appendix F.3 were previously included in Appendix F.2 (Statewide Existing Affordable Multifamily Program) of the 2022 Implementation Plan.

		between NYSERDA, NYPA, and NYCHA		
		<ul style="list-style-type: none"> Along with NYCHA and NYPA, select winning manufacturer(s) that responded to Clean Heat for All packaged window heat pump challenge RFP 		Complete
		<ul style="list-style-type: none"> Provide technical assistance and staffing resources to assist with capacity-building at HCR and HPD 		Complete
2023		<ul style="list-style-type: none"> Issue initial small purchase order for and install initial packaged window heat pumps in NYCHA properties as part of 'demonstration phase' of Clean Heat for All initiative 		In Progress
			<ul style="list-style-type: none"> Begin M&V of installed units to measure performance through the heating season 	In Progress
			<ul style="list-style-type: none"> Begin contracting with first cohort of projects selected under the Future Housing Initiative (FHI) new construction pilot 	In Progress

			program with NYC HPD	
2024		<ul style="list-style-type: none"> Assess viability of packaged window heat pumps as an effective electrification approach/model for NYCHA housing and broader NY multifamily market packages as part of AMEEP 		Future
		<ul style="list-style-type: none"> Pending success of demonstration phase, initiate broader implementation phase of Clean Heat for All initiative and install additional packaged window heat pumps 		Future
			<ul style="list-style-type: none"> Assess the efficacy of the Direct Injection funding approach in promoting electrification and energy efficiency in existing buildings going through the refinancing cycle 	Future

Milestones marked as “Delayed” or “No Longer Applicable”

The “Ongoing stakeholder engagement and coordination with other programs (e.g., NYS HCR, NYC HPD and housing agencies)” milestone originally included for 2022 in the 2020 Implementation Plan has been replaced with “Expand direct funding partnership

between NYSEDA and NYS HCR to serve affordable housing new construction and preservation,” which is more specific and actionable.

F.4 Technical Assistance for Affordable Multifamily Buildings

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020	<ul style="list-style-type: none"> Develop process to coordinate technical assistance with incentive-based program 			Complete
	<ul style="list-style-type: none"> Work with housing agencies and financiers to identify gaps in available performance data and invest in the development of data sets that can be used to aid in determinations on underwriting and build confidence among financiers and housing agencies 			Complete
2021	<ul style="list-style-type: none"> Launch technical assistance in a coordinated approach with the incentive-based program 			Complete
	<ul style="list-style-type: none"> Identify additional opportunities to work with housing agencies and financiers to develop initiatives to aid in project development 			Complete

		<ul style="list-style-type: none"> Identify technical assistance provider to service NYSERDA/ NYC HPD electrification pilot¹¹² 		Complete
		<ul style="list-style-type: none"> Identify projects for the NYSERDA/ NYC HPD electrification pilot 		Complete
		<ul style="list-style-type: none"> NYSERDA will offer FlexTech services for AMEEP projects that pay SBC on gas but not electric 		Complete
		<ul style="list-style-type: none"> NYSERDA will assess how technical assistance feeds into and informs the development and completion of the 2M climate friendly homes by 2030 action plan 		Complete
		<ul style="list-style-type: none"> Clean Heating and Cooling Analysis of FlexTech studies that will help inform future program development and is intended to increase the rate at which clean energy technologies are identified through 		Complete

¹¹² Additional historical milestones for 2021 (*i.e.*, as compared to the 2020 Plan) are provided here to reflect additional detail for Technical Assistance for Affordable Multifamily Buildings.

		studies or best practices		
2022	<ul style="list-style-type: none"> Calibration of programs, where necessary, to improve impact and reach underserved or otherwise disadvantaged communities. 	<ul style="list-style-type: none"> Update program eligibility to increase access in disadvantaged communities <i>(milestone moved from 2022 to 2023)</i> 		Delayed
	<ul style="list-style-type: none"> Ongoing stakeholder engagement and coordination with other programs (e.g., NYS HCR, NYC HPD and housing agencies) 	<ul style="list-style-type: none"> Engage with NYS HCR colleagues, affordable housing owners, and developers to refine integration of technical assistance within housing financing application processes 		Complete
		<ul style="list-style-type: none"> Encourage energy service providers to include electrification and/or electrification readiness as part of any subsidized technical assistance scopes to support long-term decarbonization efforts 		Complete
2023		<ul style="list-style-type: none"> Provide technical assistance resources to housing agencies to build in-house capacity to assess and support sustainability as 		Complete

		part of core mission		
		<ul style="list-style-type: none"> Require consideration of electrification and/or electrification readiness as part of any subsidized technical assistance to enable long-term building decarbonization efforts 	<ul style="list-style-type: none"> Recommend consideration of electrification and/or electrification readiness as part of any subsidized technical assistance to enable long-term building decarbonization efforts <i>(milestone moved from 2023 to 2024)</i> 	Delayed
			<ul style="list-style-type: none"> Update program eligibility to increase access in disadvantaged communities <i>(milestone moved to 2023 from 2022)</i> 	In Progress
2024			<ul style="list-style-type: none"> Recommend consideration of electrification and/or electrification readiness as part of any subsidized technical assistance to enable long-term building decarbonization efforts <i>(milestone moved to 2024 from 2023)</i> 	In Progress

			<ul style="list-style-type: none"> • Modify technical assistance offerings to increase engagement with disadvantaged communities 	Planning
2025			<ul style="list-style-type: none"> • Plan transition to next iteration of NYSERDA technical assistance programs 	Planning

Milestones marked as “Delayed” or “No Longer Applicable”

The “Recommend consideration of electrification and/or electrification readiness as part of any subsidized technical assistance to enable long-term building decarbonization efforts” milestone originally included for 2023 in the 2022 Implementation Plan has been moved to 2024. Progress was made on this milestone in 2023 but it is now targeted for completion in 2024.

The “Update program eligibility to increase access in disadvantaged communities” milestone originally included for 2022 in the 2022 Implementation Plan has been moved to 2023, as it is currently in progress.

F.5 RetrofitNY

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2021	<ul style="list-style-type: none"> One or more solutions are built and tested through the design-build competition process 			In Progress
	<ul style="list-style-type: none"> Solution(s) are adapted to additional building typologies 			In Progress
2022	<ul style="list-style-type: none"> Integration of retrofit solutions in the public housing authorities' and affordable housing regulators' preservation strategies <i>(milestone moved from 2022 to 2023 and 2024)</i> 			No Longer Applicable
2023	<ul style="list-style-type: none"> Integration of retrofit solutions in the public housing authorities' and affordable housing regulators' preservation strategies <i>(milestone moved</i> 	<ul style="list-style-type: none"> Integration of retrofit solutions in the public housing authorities' strategies <i>(milestone moved to 2023 from 2022)</i> 		In Progress

	<i>to 2023 from 2022)</i>			
			<ul style="list-style-type: none"> Close out RetrofitNY program and ensure that projects that have advanced through key stage gates receive support before program is closed 	In Progress
2024	<ul style="list-style-type: none"> Integration of retrofit solutions in the public housing authorities' and affordable housing regulators' preservation strategies <i>(milestone moved to 2024 from 2022)</i> 	<ul style="list-style-type: none"> Integration of retrofit solutions into regulated affordable housing preservation strategies <i>(milestone moved to 2024 from 2022)</i> 		No Longer Applicable
			<ul style="list-style-type: none"> Publish lesson learned and insights from RetrofitNY program 	Future
2025	<ul style="list-style-type: none"> Retrofit solutions are cost effective and NYSERDA subsidies are no longer necessary. 	<ul style="list-style-type: none"> Deliver retrofit solutions that are cost effective such that NYSERDA subsidies are no longer necessary 		No Longer Applicable
	<ul style="list-style-type: none"> Building components and systems required for deep energy retrofits are readily available in 	<ul style="list-style-type: none"> Develop a market for building components and systems required for deep energy retrofits so that they are readily 		No Longer Applicable

	the New York market.	available in New York		
	<ul style="list-style-type: none"> • Financing solutions exists for building owners to purchase these solutions with minimal upfront cost. 	<ul style="list-style-type: none"> • Support creation of financing solutions to enable building owners to take advantage of these solutions at scale 		No Longer Applicable

Milestones marked as “Delayed” or “No Longer Applicable”

The RetrofitNY program is closing at the end of 2023. Given this, all outstanding milestones from the 2020 and 2022 Implementation Plan have been marked as “No Longer Applicable” in this Implementation Plan.

F.6 Multifamily LMI Decarbonization Demonstration Projects¹¹³

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2024			<ul style="list-style-type: none"> Build first cohort of LMI Multifamily Demonstration partners 	Future
			<ul style="list-style-type: none"> Fund first round of LMI Multifamily Demonstration projects 	Future
2025			<ul style="list-style-type: none"> Build second cohort of LMI Multifamily Demonstration partners 	Future
			<ul style="list-style-type: none"> Fund second round of LMI Multifamily Demonstration projects 	Future
			<ul style="list-style-type: none"> Publish lessons learned and key insights from LMI Multifamily Demonstration Program 	Future

¹¹³ Section added in the 2023 Implementation Plan.

F.7 Affordable New Construction

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020	<ul style="list-style-type: none"> Existing programs will continue 			Complete
	<ul style="list-style-type: none"> Design of coordinated offerings between NYSERDA and utilities 			No Longer Applicable
2021	<ul style="list-style-type: none"> Launch of coordinated program offerings 			No Longer Applicable
	<ul style="list-style-type: none"> Launch of high-performance demonstrations and competitions 			Complete
2022	<ul style="list-style-type: none"> Launch of high-performance demonstrations and competitions 			Complete
	<ul style="list-style-type: none"> Incorporation of lessons learned from previous demonstrations and competitions 			Complete
		<ul style="list-style-type: none"> Launch of Round 3 of the Buildings of Excellence Multifamily Design Competition 		Complete ¹¹⁴
		<ul style="list-style-type: none"> Expand integrated funding with State 		Complete

¹¹⁴ Status updated from “In Progress” in the April 29, 2022, Implementation Plan filing to “Complete” in the November 1, 2022, Implementation Plan filing.

		and local affordable housing agencies		
2023		<ul style="list-style-type: none"> Continue expanding integration with public housing agencies 	<ul style="list-style-type: none"> Continue supporting expanded integration with public housing agencies 	In Progress
		<ul style="list-style-type: none"> Utilize data and successful sets from decarbonization projects to deploy information through Channel Partners, conferences, and other general awareness activities 		In Progress
			<ul style="list-style-type: none"> Launch of Round 4 of the Buildings of Excellence Competition for multifamily building design 	In Progress
2024		<ul style="list-style-type: none"> Continue expanding integration with public housing agencies 	<ul style="list-style-type: none"> Continue supporting expanded integration with public housing agencies 	Future
		<ul style="list-style-type: none"> Utilize data and successful sets from decarbonization projects to deploy information through Channel Partners, conferences, and other general 		Future

		awareness activities		
			<ul style="list-style-type: none"> • Launch Round 5 of the Buildings of Excellence Competition for multifamily building design 	Future
2025		<ul style="list-style-type: none"> • Continue expanding integration with public housing agencies 	<ul style="list-style-type: none"> • Continue supporting expanded integration with public housing agencies 	Future
		<ul style="list-style-type: none"> • Utilize data and successful sets from decarbonization projects to deploy information through Channel Partners, conferences, and other general awareness activities 		Future

Milestones marked as “Delayed” or “No Longer Applicable”

The “Design of coordinated offerings between NYSERDA and utilities” and “Launch of coordinated program offerings” milestones originally included for 2020 and 2021 in the 2020 Implementation Plan are no longer applicable as the milestones have evolved with the New Construction portfolio. NYSERDA will continue to coordinate with Utilities throughout all sectors of the LMI portfolio.

F.8 Beneficial Electrification in LMI Homes

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020	<ul style="list-style-type: none"> Research and analysis on institutional barriers, consumer protections, and application of heat pump solutions to ensure greater impact for LMI customers, tenants, and affordable multifamily building owners 			Complete
	<ul style="list-style-type: none"> Design of short-term incentives 	<ul style="list-style-type: none"> Design and launch short-term incentives to offset costs of heat pump installations in LMI homes and affordable multifamily buildings to advance heat pump deployment in LMI housing and support future market learnings¹¹⁵ 		Complete
2021	<ul style="list-style-type: none"> Continued research and analysis 			No Longer Applicable
	<ul style="list-style-type: none"> Launch of short-term incentives to offset costs of heat 			Complete

¹¹⁵ This historical milestone for 2020 is updated (*i.e.*, as compared to the 2020 Plan) to provide additional detail regarding short-term incentives.

	pump installations in LMI homes or affordable multifamily buildings			
	<ul style="list-style-type: none"> • Launch pilots and demonstrations 			Complete
	<ul style="list-style-type: none"> • Assess lessons learned from research, analysis, pilots, and incentive offerings 			In Progress
2022	<ul style="list-style-type: none"> • Continued pilots and demonstrations 			No Longer Applicable
	<ul style="list-style-type: none"> • Continued incentive offerings 			No Longer Applicable
	<ul style="list-style-type: none"> • Planning for long-term investment in electrification for the LMI market segment, based on research and analysis and learnings from the pilots, demonstrations, and incentive offerings 			No Longer Applicable
		<ul style="list-style-type: none"> • Launch evaluation and market insights study based on projects completed through short-term incentive offering incentive offerings 		In Progress
		<ul style="list-style-type: none"> • Publish LMI chapter within Building Electrification Roadmap, outlining key policy 		Complete

		approaches to scale LMI electrification through 2030		
		<ul style="list-style-type: none"> Partner with sister agencies to aggressively shift existing benefit programs into alignment with the State’s housing decarbonization targets, especially LIHEAP, WAP, and the State’s Energy Affordability Policy and Utility Energy Assistance Programs 		Delayed
		<ul style="list-style-type: none"> Conduct research and analysis on electrification of affordable housing, develop recommendations for protecting tenants from heating cost shifts¹¹⁶ 		Complete ¹¹⁷
		<ul style="list-style-type: none"> Continue programmatic support for LMI heat pump installations, with a focus on segments that present the least technical difficulty and/or the most favorable return on investment, including buildings 		In Progress

¹¹⁶ Milestone updated from “Conduct research and analysis leading to the development of an Affordability and Consumer Protections framework for LMI Electrification, outlined in the Two Million Climate-Friendly Homes Action Plan” in the April 29, 2022, Implementation Plan filing to current language.

¹¹⁷ Status updated from “Planning” in the April 29, 2022, Implementation Plan filing to “In Progress” in the November 1, 2022, Implementation Plan filing.

		using delivered fuels and electric resistance heat, buildings with inefficient gas furnaces or boilers, and multifamily buildings with steam distribution systems		
		<ul style="list-style-type: none"> • Design and launch a program offering supporting rapid response heat pump conversions in situations where existing fossil heating systems are at or near failure 		Delayed
		<ul style="list-style-type: none"> • Launch additional program support for LMI multifamily building owners seeking to integrate electrification into their portfolio by providing wraparound services for guidance on capital planning, identifying best-fit technology solutions, employee training, project scoping, how to overcome hurdles related to existing subsidy agreements and tenant leases, and identifying incentives and other financial support for 		No Longer Applicable

		installing heat pumps		
		<ul style="list-style-type: none"> Design pilot(s) supporting DHW electrification conversions for multifamily buildings 		No Longer Applicable
		<ul style="list-style-type: none"> Launch research focused on policy and regulatory initiatives that can further enable heat pump adoption in LMI housing 		In Progress
		<ul style="list-style-type: none"> Conduct Stakeholder engagement to develop promising approaches for community- and place-based interventions supporting heat pump deployment in LMI and Disadvantaged Communities 		No Longer Applicable
		<ul style="list-style-type: none"> Develop and launch additional educational materials for LMI customers and building owners, including short how-to videos and other multimedia offerings 		In Progress
		<ul style="list-style-type: none"> In collaboration with DPS and the utilities, identify the scope of and pathway to increased support for pre-electrification make-ready work 		No Longer Applicable

		such as electrical panel upgrades		
2023		<ul style="list-style-type: none"> Publish interim learnings from the single-family LMI heat pump demonstration study (short term incentives) 		Delayed
		<ul style="list-style-type: none"> Publish interim learnings from the multifamily LMI heat pump demonstrations study (short term incentives) 		Delayed
		<ul style="list-style-type: none"> Revise program rules to incorporate learnings from affordability and consumer protections research 		No Longer Applicable
			<ul style="list-style-type: none"> Convene contractors, suppliers, and manufacturers of heat pump solutions to provide insights on current practices and on how the State can expand support for heat pump conversions during emergency no heat situations in 1-4 family homes 	In Progress
			<ul style="list-style-type: none"> Convene affordable housing and 	In Progress

			finance stakeholders to gather information and determine an action plan for supporting heat pump adoption with tenant protections in the rent stabilized portfolio of NY's rental housing market	
			<ul style="list-style-type: none"> Complete market research on and modeling of utility bill impacts of LMI electrification 	In Progress
			<ul style="list-style-type: none"> Complete market research on programmatic, policy, and regulatory barriers to electrification in LMI multifamily housing 	In Progress
2024		<ul style="list-style-type: none"> Publish interim learnings from pilots and demonstrations 		No Longer Applicable
		<ul style="list-style-type: none"> Revise program rules to incorporate affordability and consumer protections learnings from research and evaluation of real-world projects 		No Longer Applicable
			<ul style="list-style-type: none"> Publish interim learnings from 	Future

			LMI heat pump demonstration study (short term incentives)	
			<ul style="list-style-type: none"> Socialize and begin implementing recommendations to State agencies from earlier market research on lowering programmatic, policy, and regulatory barriers to electrification in LMI multifamily housing. 	Future
			<ul style="list-style-type: none"> Partner with sister agencies to develop guidance for affordable multifamily building owners on electrification: pathways to secure state, utility, and federal funding for heat pump projects; and technical, legal, regulatory, and business considerations for altering provision of building services to tenants 	Future
			<ul style="list-style-type: none"> Launch a pilot supporting rapid response heat pump conversions in 	Future

			situations where existing fossil heating systems are at or near failure, for 1-4 family homes	
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Milestones marked as “Delayed” or “No Longer Applicable”

The milestones marked as “Delayed” and “No Longer Applicable” have evolved and are combined to create new milestones as noted above.

F.9 New York State Healthy Homes Value-Based Payment Pilot

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan ¹¹⁸	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020		<ul style="list-style-type: none"> Finalize specification list for the Healthy Homes intervention associated with the pilot 		Complete
		<ul style="list-style-type: none"> Onboard energy services implementation contractor and health services implementation partners 		Complete
		<ul style="list-style-type: none"> Secure submission of social determinants of health template for VBP Arrangement integration 		Complete
		<ul style="list-style-type: none"> Finalize specification list for healthy homes interventions that address asthma and household injury 		Complete
2021		<ul style="list-style-type: none"> Release a Request for Qualifications for pilot participating energy/housing service providers and assign pilot participation status to qualified providers 		Complete
		<ul style="list-style-type: none"> Commence pilot field work 		Complete

¹¹⁸ Milestones for 2020 and 2021 are included here for New York State Healthy Homes Value-Based Payment Pilot and were not included in the 2020 Implementation Plan.

2022		<ul style="list-style-type: none"> Complete value-based payment participation toolkits for MCO/VBP providers and community-based organizations 		Complete
2023		<ul style="list-style-type: none"> Commence interim reporting on Year One intervention implementation process¹¹⁹ 	<ul style="list-style-type: none"> Commence interim reporting on Year One intervention implementation process, to be incorporated into Pilot outcomes and evaluation report 	In Progress
2024		<ul style="list-style-type: none"> Complete draft of the full evaluation report 	<ul style="list-style-type: none"> Complete draft of the Pilot outcome analysis, to be incorporated into the full Pilot evaluation 	Planning

¹¹⁹ Milestone delayed from 2022 in the April 29, 2022, Implementation Plan filing to 2023 in the November 1, 2022, Implementation Plan filing. Milestone delay due to complications of the COVID-19 pandemic, challenges in enrolling eligible Medicaid members in the Pilot, challenges in obtaining full consent from interested eligible members, and challenges maintaining engagement and continuity of Pilot services with those households who are fully consented.

F.10 LMI Portfolio Marketing

Year	2020 and 2021 “Key Milestones” from 2020 IP ¹²⁰	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020 and 2021	Statewide Brand: <ul style="list-style-type: none"> The Program Administrators expect to complete development by the first quarter of 2021 			Complete
2020 and 2021	NY Energy Advisor: <ul style="list-style-type: none"> During Q3 of 2020, the Program Administrators expect to launch an initial version of the NY Energy Advisor website, introducing customers and affordable housing property owners to the current initiative offerings The full NY Energy Advisor website will be launched by end of Q2 2021 			Complete
2020 and 2021	Hard Copy Customer Education Collateral and Multilingual Communications: <ul style="list-style-type: none"> Hard copy customer collateral will be developed in parallel with the online NY Energy Advisor, in order to ensure consistent messaging and calls 			Complete

¹²⁰ Note that the milestones listed in this column were not provided within milestones tables in the 2020 Implementation Plan. Rather, information is drawn from descriptions of Key Milestones in the 2020 Implementation Plan.

	to action and to streamline development costs			
2020 and 2021	Community-Based Marketing and Paid Advertising: <ul style="list-style-type: none"> Specific media and paid advertising approaches will be developed and coordinated with the statewide campaign and as initiatives are added/changed in the Portfolio 			Complete
2022		NY Energy Advisor: <ul style="list-style-type: none"> Launch a marketing campaign for the NY Energy Advisor in Q1 2022 that will continue through 2025 		Complete
		Hard Copy Customer Education Collateral and Multilingual Communications: <ul style="list-style-type: none"> Develop and distribute to stakeholders hard copy customer collateral beginning in Q1 2022 in parallel with operation of the online NY Energy Advisor, to ensure consistent messaging and calls to action and to streamline development costs. Materials available 		Complete

		in multiple languages include posters and fact sheets.		
		Community-Based Marketing and Paid Advertising: <ul style="list-style-type: none"> • Specific media and paid advertising approaches will be developed and coordinated with the statewide campaign and as initiatives are added/changed in the Portfolio 		Complete
2023		NY Energy Advisor: <ul style="list-style-type: none"> • Review NY Energy Advisor analytics, determining effectiveness of marketing campaigns • Make adjustment to paid media campaigns if needed • Continue to support the Program Administrators and stakeholders' efforts to obtain earned media 	NY Energy Advisor: <ul style="list-style-type: none"> • Leverage campaign learnings from 2022 & 2023 to guide media strategy and improved channel selection • Drive increased quiz starts that will connect customers with assistance programs <p>Due to successful engagement, targeting for 2024 (beginning in 2023) will see an expansion in Hispanic Audience targeting</p>	In Progress
2024		NY Energy Advisor: <ul style="list-style-type: none"> • Continue to analyze NY Energy Advisor marketing campaigns and make corresponding 	NY Energy Advisor: <ul style="list-style-type: none"> • Continue to identify key opportunities to evolve outreach for both online 	Future

		<p>campaign adjustments</p>	<p>and offline audiences</p> <ul style="list-style-type: none"> • Build upon success and learnings to date by leveraging highest-performing paid media placements and expanding language access across channels <p>Leverage Clean Energy Hub, Community and Partner feedback to create assets, collateral and continue to build awareness for NY Energy Advisor and it's solutions for LMI New Yorkers</p>	
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F.11 Community-Based Outreach, Education, and Engagement Partnerships

Year	2020 and 2021 “Key Milestones” from 2020 IP	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2020 and 2021	<p>Expansion of Existing LMI Community Partnerships:</p> <ul style="list-style-type: none"> Starting in 2021, the Program Administrators will design the community-based outreach and engagement initiative, with full implementation launch in Q2 2021 to provide timely transition from the current CEEP Program NYSERDA has been engaged with community partners in a co-design process to identify opportunities for improving the reach and impact of an outreach and engagement initiative within disadvantaged communities. This co-design process began in early 2020 and will inform the design of the subsequent community engagement initiative. 			Complete
2020 and 2021	<p>Neighborhood-Based Delivery Model:</p> <ul style="list-style-type: none"> During the balance of 2020, the Program Administrators will assess evaluation 			No Longer Applicable

	<p>results from the existing pilots and determine effectiveness of the neighborhood-based delivery model. If warranted, the Program Administrators will develop a replicable event/implementation plan, including consideration of remote webinar-based platforms as an alternative delivery mechanism to minimize risks associated with large, in-person events. The target for rollout would be Q3 2021.</p>			
2022		<ul style="list-style-type: none"> The Regional Clean Energy Hub network will be launched in Q3 2022, incorporating input from the 2020 co-design process with community partners to improve the reach and impact of outreach and engagement efforts within disadvantaged communities 		Complete
2023		<ul style="list-style-type: none"> Hubs fully onboarded in the market and working with local communities to 	<ul style="list-style-type: none"> Hubs fully operational in the market and working within regions to 	In Progress

		support and streamline program engagement	support and streamline program engagement	
2024		<ul style="list-style-type: none"> Hubs to begin launching community campaigns and local pilot programs 		Future

Milestones marked as “Delayed” or “No Longer Applicable”

Due to evolving LMI Portfolio budgets and programs, a replication of the neighborhood-based delivery model as references is no longer considered to be applicable to the utility programs. Learnings from this model could be incorporated into activities with the NYSERDA Regional Clean Energy Hubs.

F.12 Community-Based Customer Engagement Initiatives

Year	2020 and 2021 "Key Milestones" from 2020 IP	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2022		<p>Community-Based Customer Engagement Initiatives:</p> <ul style="list-style-type: none"> • Central Hudson plans to continue their Community Lighting Program and will distribute LEDs through Food Banks and the United Way starting again in 2022. • Con Edison will continue to offer energy efficiency kits via an opt-in approach to customers participating in Con Edison’s Energy Affordability Program (formerly called the Low Income Discount Program) and to collaborate with food pantries to distribute LED lightbulbs. • National Grid will expand their LED Food Bank program to the Albany and Syracuse areas and will increase frequency to twice per year with continued collaboration with NYSEG/RGE • Orange & Rockland will expand their food bank kit offering and 		Complete

		<p>will provide energy efficiency kits via an opt-in approach for customers participating in the Company’s Energy Affordability Program. Additionally, Orange & Rockland will expand the existing MY ORU Store e-commerce platform to include additional functionality that includes new tools, products, and offerings that will specifically engage and guide LMI customers to make energy-wise decisions for their homes.</p>		
		<p>Neighborhood-Based Delivery Model:</p> <ul style="list-style-type: none"> • During the balance of 2022, the Program Administrators will assess evaluation results from the existing pilots and determine effectiveness of the neighborhood-based delivery model. If warranted, the Program Administrators will develop a replicable event/implementation plan, including consideration of remote webinar-based platforms as an alternative delivery 		No Longer Applicable

		<p>mechanism to minimize risks associated with large, in-person events. This event/outreach strategy would be implemented beginning in 2022 after final evaluation results are determined.</p>		
2023			<p>Community-Based Customer Engagement Initiatives:</p> <ul style="list-style-type: none"> • Utilities to continue to offer, assess, and improve Community-Based Customer Engagement Initiatives (as described in Section 5.3) • Utilities to adopt, assess, and implement strategies for improving customer awareness of and participation in EmPower+ on an individual or collective utility basis 	
2024			<ul style="list-style-type: none"> • Utilities to continue to offer, assess, and improve Community-Based Customer 	In Progress

			Engagement Initiatives (as described in Section 5.3) <ul style="list-style-type: none"> • Utilities to adopt and implement strategies for improving customer awareness of and participation in EmPower+ on an individual or collective utility basis 	
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Milestones marked as “Delayed” or “No Longer Applicable”

Due to evolving LMI Portfolio budgets and programs, a replication of the neighborhood-based delivery model as references is no longer considered to be applicable to the utility programs. Learnings from this model could be incorporated into activities with the NYSERDA Regional Clean Energy Hubs.

F.13 Evaluation, Measurement, & Verification Approach

Year	Milestone from 2020 Implementation Plan	Milestone Added or Updated in a 2022 revision to the Implementation Plan	Milestone Added or Updated in the 2023 Implementation Plan	Status
2022		<ul style="list-style-type: none"> Continued ongoing meetings between Program Administrator VGS teams 		Complete
		<ul style="list-style-type: none"> Refine and finalize standardized survey questions to be used when conducting process evaluation research 		Complete
		<ul style="list-style-type: none"> Complete 2017-Q1 2019 evaluation of EmPower NY Program, on target to be finished by NYSERDA in Q4 2022 		Complete
		<ul style="list-style-type: none"> Begin to develop and implement average existing condition baselines, facilitated through the TRM Management Committee, and identify key LMI measures for further research 	<ul style="list-style-type: none"> Continue to develop and implement average existing condition baselines, facilitated through the TRM Management Committee, and identify key LMI measures for further research (<i>milestone moved from 2022 to 2024</i>) 	Delayed

		<ul style="list-style-type: none"> Select EM&V vendor for AMEEP evaluations to be undertaken in 2023 		No Longer Applicable
		<ul style="list-style-type: none"> Assess impact of NYS Clean Heat coordination with AMEEP and any resulting evaluation needs 		No Longer Applicable
2023		<ul style="list-style-type: none"> Begin EmPower+ evaluation process <i>(milestone moved from 2023 to 2024)</i> 		Delayed
		<ul style="list-style-type: none"> Develop the workplan and conduct statewide evaluation for AMEEP, as operated in 2022 <i>(milestone moved from 2023 to 2024)</i> 		Delayed
			<ul style="list-style-type: none"> Continue ongoing meetings between Program Administrator VGS teams 	In Progress
2024			<ul style="list-style-type: none"> Develop workplan, select EM&V vendor, and conduct statewide evaluation for AMEEP, as initiated in 2023 <i>(milestone moved to 2024 from 2023)</i> 	Future
			<ul style="list-style-type: none"> Continue to develop and implement average existing condition 	Future

			baselines, facilitated through the TRM Management Committee, and identify key LMI measures for further research <i>(milestone moved to 2024 from 2022)</i>	
			<ul style="list-style-type: none"> • Begin EmPower+ evaluation process <i>(milestone moved to 2024 from 2023)</i> 	Future

Milestones marked as “Delayed” or “No Longer Applicable”

The “Begin to develop and implement average existing condition baselines, facilitated through the TRM Management Committee, and identify key LMI measures for further research” milestone originally included for 2022 in the 2022 Implementation Plan has been delayed to 2024, due to Program Administrator strategic prioritization.

The “Select EM&V vendor for AMEEP evaluations to be undertaken in 2023” milestone originally included for 2022 in the 2022 Implementation Plan is “No Longer Applicable” because it has been incorporated into a new milestone for 2024.

The “Assess impact of NYS Clean Heat coordination with AMEEP and any resulting evaluation needs” milestone originally included for 2022 in the 2022 Implementation Plan is “No Longer Applicable” as no evaluation needs related to NYS Clean Heat coordination with AMEEP are anticipated at this time.

The “Begin EmPower+ evaluation process” milestone originally included for 2023 in the 2022 Implementation Plan is “Delayed,” as it is now planned for completion in 2024.

The “Develop the workplan and conduct statewide evaluation for AMEEP, as operated in 2022” milestone originally included for 2023 in the 2022 Implementation Plan is delayed, as the AMEEP evaluation is planned for launch in late 2023.

Appendix G: Scorecard Program Mapping to Implementation Plan Statewide Categories

This appendix maps individual LMI programs as identified in Program Administrators' quarterly scorecard reporting to Implementation Plan Statewide Categories and Sub-Initiatives.

G.1 Central Hudson

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+	Electric	Empower (Electric)	CH-E-L-R-22				
Existing Affordable Multifamily Buildings	AMEEP	Electric	Clean Heat (CH) & Affordable Multifamily Energy Efficiency Program (AMEEP)	CH-E-M-X-21				
Customer Awareness, Outreach & Engagement	Distribution of LEDs through food banks and the United Way	Electric	Community Lighting ¹²¹	CH-E-M-R-5				
Existing 1-4 Family Homes	EmPower+	Gas	Empower (Gas)	CH-G-L-R-23				
Existing Affordable	AMEEP	Gas	Affordable Multifamily Energy	CH-G-L-M-20				

¹²¹ Central Hudson's community lighting program described in the Community-Based Outreach, Education, and Engagement Partnerships section of the Implementation Plan was historically accounted for under market rate programs. Since the initiative was created to support and engage with LMI customers in our service territory, the Community Lighting program was moved under the Statewide LMI Portfolio in 2021. No Incentive or Implementation costs are associated with the Customer Awareness, Outreach & Engagement program as the cost for the measures distributed through this program were incurred as a bulk purchase before the program was incorporated into the LMI portfolio and the program is implemented by partner organizations.

Multifamily Buildings			Efficiency Program (AMEEP)					
Customer Awareness, Outreach & Engagement		Gas						

G.2 Con Edison

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+	Electric	Empower Electric	CE-E-L-R-32N				
Existing Affordable Multifamily Buildings	AMEEP	Electric	Affordable Multifamily Energy Efficiency Program (AMEEP) Electric	CE-E-L-M-5N	Multifamily - LMI	CE-E-L-M-4N	Multifamily - LMI	CE-E-L-M-4N
Customer Awareness, Outreach & Engagement	Energy Conservation Kits Program for EAP customers	Electric	Efficiency Starter Program - LMI	CE-E-L-R-14N	Efficiency Starter Program - LMI	CE-E-L-R-14N	Efficiency Starter Program - LMI	CE-E-L-R-14N
	Food banks LED distribution	Electric	Retail Lighting - LMI	CE-E-L-R-25N	Retail Lighting - LMI	CE-E-L-R-25N	Retail Lighting - LMI	CE-E-L-R-25N
	Home Energy Reports	Electric					Residential Home Energy Reports - LMI	CE-E-L-R-17N
Existing 1-4 Family Homes	EmPower+	Gas	Empower Gas	CE-G-L-R-32N				
Existing Affordable Multifamily Buildings	AMEEP	Gas	Affordable Multifamily Energy Efficiency Program (AMEEP) Gas	CE-G-L-M-5N	Multifamily - LMI	CE-G-L-M-4N	Multifamily - LMI	CE-G-L-M-4N
Customer Awareness, Outreach & Engagement	Energy Conservation Kits Program	Gas	Efficiency Starter Program - LMI	CE-G-L-R-14N	Efficiency Starter Program - LMI	CE-G-L-R-14N	Efficiency Starter Program - LMI	CE-G-L-R-14N

	for EAP customers							
	Home Energy Reports	Gas					Residential Home Energy Reports - LMI	CE-G-L-R-17N

G.3 National Grid (KEDLI)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	KEDLI HEAT	Gas	Gas LMI - Existing 1-4 Family Homes Program	KL-G-L-R-12	Gas LMI - Existing 1-4 Family Homes Program	KL-G-L-R-12		
Existing Affordable Multifamily Buildings	AMEEP	Gas	Gas LMI - Existing Affordable Multifamily Program	KL-G-L-M-13				
Customer Awareness, Outreach & Engagement	Customer Awareness, Outreach, & Engagement Program	Gas	Gas LMI - Customer Awareness, Outreach, & Engagement Program	KL-G-L-R-10				

G.4 National Grid (KEDNY)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+	Gas	Gas LMI - Existing 1-4 Family Homes Program	KN-G-L-R-12				
Existing Affordable Multifamily Buildings	AMEEP	Gas	Gas LMI - Existing Affordable Multifamily Program	KN-G-L-M-13				
Customer Awareness, Outreach & Engagement	Customer Awareness, Outreach, & Engagement Program	Gas	Gas LMI - Customer Awareness, Outreach, & Engagement Program	KN-G-L-R-10				

G.5 National Grid (NMPC)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+	Electric	Electric LMI - Existing 1-4 Family Homes Program	NM-E-L-R-16				
Existing Affordable Multifamily Buildings	AMEEP	Electric	Electric LMI - Existing Affordable Multifamily Program	NM-E-L-M-17				
Customer Awareness, Outreach & Engagement	LED Food Bank Program	Electric	Electric LMI - Customer Awareness, Outreach, & Engagement Program	NM-E-L-R-14				
Existing 1-4 Family Homes	EmPower+	Gas	Gas LMI - Existing 1-4 Family Homes Program	NM-G-L-R-12				
Existing Affordable Multifamily Buildings	AMEEP	Gas	Gas LMI - Existing Affordable Multifamily Program	NM-G-L-M-13				
Customer Awareness, Outreach, &	Customer Awareness, Outreach, &	Gas	Gas LMI - Customer Awareness,	NM-G-L-R-10				

Outreach & Engagement	Engagement Program		Outreach, & Engagement Program					
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G.6 National Fuel Gas

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+	Gas	EmPower	NF-G-LMI-R-3J	EmPower	NF-G-LMI-R-3J	EmPower	NF-G-LMI-R-3J
Existing Affordable Multifamily Buildings	AMEEP	Gas	Affordable Multifamily Energy Efficiency Program (AMEEP)	NF-G-LMI-R-4J				
Customer Awareness, Outreach & Engagement ¹²²		Gas						

¹²² National Fuel Gas's weatherization kits program described in the Community-Based Outreach, Education, and Engagement Partnerships section of the IP does not report savings. Spend is included as part of Market Rate Portfolio Administration.

G.7 New York State Electric & Gas (NYSEG)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+	Electric	LMI 1-4 Family Homes	NS-E-L-R-7	LMI Residential Electric	NS-E-L-R-7	LMI Residential Electric	NS-E-L-R-7; NS-E-L-R-7A
Existing Affordable Multifamily Buildings	AMEEP	Electric	The Affordable Multifamily Energy Efficiency Program	NS-E-L-M-87	LMI Multifamily Program	NS-E-L-M-6	LMI Multifamily Program	NS-E-L-M-6; NS-E-L-M-6A
Customer Awareness, Outreach & Engagement	Food Banks, Distributions to EAP, School Kits	Electric	LMI Distributions	NS-E-L-R-77				
	LMI Retail Products	Electric	Retail Lighting LMI	NS-E-L-R-75A				
Existing 1-4 Family Homes	EmPower+	Gas	LMI-Residential Gas	NS-G-L-R-23	LMI Residential Gas	NS-G-L-R-23	LMI Residential Gas	NS-G-L-R-23; NS-G-L-R-23A
Existing Affordable Multifamily Buildings	AMEEP	Gas	The Affordable Multifamily Energy Efficiency Program	NS-G-L-R-89	LMI Multifamily Program	NS-G-L-M-22	LMI Multifamily Program	NS-G-L-M-22; NS-G-L-M-22A
Customer Awareness, Outreach & Engagement		Gas	LMI Distributions	NS-G-L-M-79				

G.8 Orange & Rockland

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+	Electric	LMI Electric - EmPower	OR-E-M-R-11				
Existing Affordable Multifamily Buildings	AMEEP	Electric	LMI Electric - AMEEP	OR-E-M-R-13				
Customer Awareness, Outreach & Engagement	Food Banks, EE Kits, LMI Marketplace	Electric	LMI Electric – Customer Engagement	OR-E-M-R-15				
Existing 1-4 Family Homes	EmPower+	Gas	LMI Gas - EmPower	OR-G-M-R-12				
Existing Affordable Multifamily Buildings	AMEEP	Gas	LMI Gas - AMEEP	OR-G-M-R-14				
Customer Awareness, Outreach & Engagement	EE Kits, LMI Marketplace	Gas	LMI Gas – Customer Engagement	OR-G-M-R-16				

G.9 Rochester Gas & Electric (RG&E)

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+	Electric	LMI 1-4 Family Homes	RG-E-L-R-39	LMI Residential Electric	RG-E-L-R-39	LMI Residential Electric	RG-E-L-R-39; RG-E-L-R-39A
Existing Affordable Multifamily Buildings	AMEEP	Electric	The Affordable Multifamily Energy Efficiency Program	RG-E-L-M-88	LMI Multifamily Program	RG-E-L-M-38	LMI Multifamily Program	RG-E-L-M-38; RG-E-L-M-38A
Customer Awareness, Outreach & Engagement	Food Banks, Distributions to EAP customers, School Kits	Electric	LMI Distributions	RG-E-L-R-78				
	LMI Retail Products	Electric	Retail Lighting LMI	RG-E-L-R-76A				
Existing 1-4 Family Homes	EmPower+	Gas	LMI 1-4 Family Homes	RG-G-L-R-55	LMI Residential Gas	RG-G-L-R-55	LMI Residential Gas	RG-G-L-R-55; RG-G-L-R-55A
Existing Affordable Multifamily Buildings	AMEEP	Gas	The Affordable Multifamily Energy Efficiency Program	RG-G-L-M-90	LMI Multifamily Program	RG-G-L-M-54	LMI Multifamily Program	RG-G-L-M-54; RG-G-L-M-54A
Customer Awareness, Outreach & Engagement		Gas	LMI Distributions	RG-G-L-R-80				

G.10 New York State Energy Research & Development Authority

Statewide Category	Sub-Initiative	Fuel Type Funding Source	2022 Scorecard Program Name	2022 Scorecard Program Code	2021 Scorecard Program Name	2021 Scorecard Program Code	2020 Scorecard Program Name	2020 Scorecard Program Code
Existing 1-4 Family Homes	EmPower+		Single Family- Low income	ND-E-L-R-65	Single Family- Low income	ND-E-L-R-65	Single Family- Low income	ND-E-L-R-65
	AHP		Single Family- Moderate Income	ND-E-L-R-66	Single Family- Moderate Income	ND-E-L-R-66	Single Family- Moderate Income	ND-E-L-R-66
Existing Affordable Multifamily Buildings	Multi-Year Affordable Housing Partnerships, Technical Assistance for Affordable Multifamily Buildings		LMI Multifamily	ND-E-L-M-28a; ND-E-L-M-28b	LMI Multifamily	ND-E-L-M-28a; ND-E-L-M-28b	LMI Multifamily	ND-E-L-M-28a; ND-E-L-M-28b
	RetrofitNY		RetrofitNY-LMI	ND-E-L-M-61	RetrofitNY-LMI	ND-E-L-M-61	RetrofitNY-LMI	ND-E-L-M-61
Affordable New Construction	Affordable New Construction Housing Program		Low Rise New Construction Transition	ND-E-L-C-30	Low Rise New Construction Transition	ND-E-L-C-30	Low Rise New Construction Transition	ND-E-L-C-30
			Multifamily New Construction Transition	ND-E-L-M-39	Multifamily New Construction Transition	ND-E-L-M-39	Multifamily New Construction Transition	ND-E-L-M-39

			New Construction-LMI	ND-E-L-C-42; ND-E-L-M-42; ND-E-L-R-42	New Construction-LMI	ND-E-L-C-42; ND-E-L-M-42; ND-E-L-R-42	New Construction-LMI	ND-E-L-C-42; ND-E-L-M-42; ND-E-L-R-42
Customer Awareness, Outreach & Engagement	LIFE		Low Income Forum on Energy	ND-E-L-X-32				
	Regional Clean Energy Hubs		Regional Clean Energy Hubs	ND-E-L-X-88; ND-E-L-X-88A				
	REVitalize		REVitalize	ND-E-L-C-64				
Pilots and Demonstrations	LMI Pilots		LMI Pilots	ND-E-L-X-29				
LMI Solar	Solar for All		Solar for All	ND-E-L-X-69				
Beneficial Electrification	LMI Heat Pump Pilot		Heat Pumps Phase 2	ND-E-L-R-24				
Additional LMI Initiatives	Healthy Homes		Healthy Homes Feasibility Study	ND-E-L-R-22	Healthy Homes Feasibility Study	ND-E-L-R-22	Healthy Homes Feasibility Study	ND-E-L-R-22
			NYS Healthy Homes Value Based Payment Pilot	ND-E-L-R-48	NYS Healthy Homes Value Based Payment Pilot	ND-E-L-R-48	NYS Healthy Homes Value Based Payment Pilot	ND-E-L-R-48

Verified Gross Savings Specification

to
from
date

New York State Public Service Commission, Att: Honorable Michelle Philips, Secretary
The Joint Utilities of New York and NYSERDA
November 1, 2023

**Re: Verified Gross Savings Specification – Statewide LMI Portfolio:
Existing 1-4 Family Homes**

Verified Gross Savings Specification	
Date of Implementation Plan Filing	November 1, 2023
Initiative Name	Statewide LMI Portfolio: Existing 1-4 Family Homes
Initiative Description	<p>The 1-4 family LMI customer market segment is served by several programs. Previously, this included EmPower NY and Assisted Home Performance with ENERGY STAR (“AHPwES”), which in July 2023 were combined into the EmPower+ program. The Home Energy Affordability Team (“HEAT”) program also serves customers in the National Grid-Long Island territory. In 2021, the Low-Income Usage Reduction Program (“LIURP”) in National Fuel Gas Distribution Corporation (“NFGDC”) territory transitioned to EmPower+. The EmPower+ program is available to low- and moderate-income households and provides subsidized or no-cost energy services, while the HEAT program is available to both low- and moderate-income households, providing no-cost energy savings to low-income households and a 25-75% cost share towards an energy efficiency work scope for moderate-income households. Utilities currently refer customers to EmPower+ in accordance with currently effective Commission policy.</p>
Gross Savings Methodology	<p>Programs in this initiative claim annual MWh and MMBtu savings. Initiative savings are realized and reported in program-level Scorecards, as MWh energy and MW peak demand savings for electric and MMBtu energy savings and peak MMBtu reductions for fossil fuels (including natural gas).</p> <p>In general, the Program Administrators rely on the TRM and best practices to estimate savings and achieve VGS goals (note that NYSERDA has used modeling tools, including EmPCalc, in the past and prior to aligning its savings estimates with the TRM). For prescriptive measures, baseline studies or other evaluation data are leveraged, where available, to calculate an average existing condition baseline that approximates the type and age of equipment currently installed by LMI customers, and these assumptions have been documented in the TRM. For custom measures, project-specific existing condition baselines are used.</p>

Realization Rate (RR)

Due to recent and ongoing evaluation efforts, each utility- and NYSERDA-administered program is using existing program-specific RRs, where available, for the 2020 program year.

The NYSERDA-administered EmPower+ program has initial VGS RRs (which encompass NYSERDA's prior EmPower program specifically) of 62% for electric (MWh) and 73% for natural gas (MMBtu), based on the impact evaluation for program period 2017-Q1 2019 (NYSERDA Residential Retrofit Impact Evaluation (PY 2017-Q1 2019), filed in October 2022). These initial VGS RRs are applied retrospectively starting in 2017 and will remain in place until the next Gross Savings Analysis. Note that a prior NYSERDA impact evaluation finalized in June 2020 (Residential Retrofit Impact Evaluation, Program Year 2012-2016) assessed program period 2012-2016 and calculated VGS RRs of 58% for MWh and 44% for MMBtu. However, given the vintage of these 2012-2016 RRs, they are not applied in reporting and are included here only to complete the record on all evaluation activities.

The NYSERDA-administered AHPwES program has initial VGS RRs of 53% for electric (MWh) and 66% for natural gas (MMBtu), based on the impact evaluation for program period 2017-Q1 2019 (NYSERDA's Residential Retrofit Impact Evaluation (PY 2017-Q1 2019), filed in October 2022). These initial VGS RRs are applied retrospectively starting in 2017 and will remain in place until the next Gross Savings Analysis. Note that a prior NYSERDA impact evaluation finalized in June 2020 (NYSERDA Residential Retrofit Impact Evaluation, Program Year 2012-2016) assessed program period 2012-2016 and calculated VGS RRs of 43% for MWh and 43% for MMBtu. However, given the vintage of these 2012-2016 RRs, they are not applied in reporting and are included here only to complete the record on all evaluation activities.

LIURP, a program administered by NFGDC and implemented as part of the NYSERDA EmPower program, has an initial VGS RR of 52% for natural gas (MMBtu) based on the impact evaluation for the program period 2017-Q1 2019 (NYSERDA's Residential Retrofit Impact Evaluation (PY 2017-Q1 2019), filed in October 2022). This initial VGS RR is applied retrospectively starting in 2017 and will remain in place until the next Gross Savings Analysis. Note that a prior joint NYSERDA-NFGDC impact evaluation finalized in June 2020 (NYSERDA Residential Retrofit Impact Evaluation, Program Year 2012-2016) assessed program period 2012-2016 and calculated a VGS RR of 52% for MMBtu. However, given the vintage of this VGS RR, it is not applied in reporting and is included here only to complete the record on all evaluation activities.

	<p>National Grid’s HEAT program, administered by KEDLI on Long Island, has an initial VGS RR of 98% for natural gas (MMBtu) based on the impact evaluation of the 2018 program year (Home Energy Affordability Team (HEAT) Program Evaluation: 2018 Calendar Year Impact Evaluation, completed in December 2019). This initial VGS RR is applied retrospectively and prospectively until completion of the next Gross Savings Analysis.</p>
<p>Planned VGS Approach</p>	<p>NYSERDA anticipates a statewide Gross Savings Analysis to be undertaken in 2025 following the launch of EmPower+. Details related to the Gross Savings Analysis will be submitted in an EM&V Plan in Q1 2025. The estimated completion of the Gross Savings Analysis Report is early 2026. An independent evaluator will be competitively procured by NYSERDA, with input from the utilities, to conduct the Gross Savings Analysis.</p> <p>NYSERDA is undertaking an interim analysis of EmPower and AHPwES covering the period Q2 2022-Q1 2023 that is in scoping now and is anticipated to be complete in 2024. Future filings will detail results upon finalization. VGS RR efforts will employ methods used in prior work (i.e., IPMVP Option C).</p> <p>LIURP is offered through the EmPower NY program. NYSERDA will continue to conduct statewide evaluations for EmPower and EmPower+ using methods similar to prior work (i.e., IPMVP Option C).</p> <p>National Grid’s HEAT program underwent a Gross Savings Analysis for the 2018 program year. National Grid will seek to align the KEDLI HEAT program with NYSERDA’s EmPower+ program by offering comparable energy efficiency and health and safety measures and services, coordinating with NYSERDA’s online application process, and utilizing similar savings calculation methodologies and other program elements as appropriate. National Grid will be testing a new incentive structure for moderate-income customers that was devised by the Program Administrators as part of the EmPower redesign work. National Grid will provide lessons learned to the 1-4 Family Homes workstream to further inform the redesign. As the final program design is developed and implemented for EmPower+, National Grid will align with the incentive structure and processes as much as possible while still maintaining its role as administrator of the KEDLI HEAT program. National Grid plans to participate in the statewide evaluation of EmPower+ when it occurs.</p> <p>In addition to Program Administrator-specific evaluation activities, the Joint Utilities and NYSERDA are:</p>

	<ul style="list-style-type: none">• Collaborating to develop statewide and regional average existing condition baselines, where appropriate, as facilitated through the TRM Management Committee. In Q3 2021, key 1-4 family home LMI measures were identified for further research.
Exemption from EAM Status	Not exempt

Verified Gross Savings Specification

to
from
date

New York State Public Service Commission, Att: Honorable Michelle Philips, Secretary
The Joint Utilities of New York and NYSERDA
November 1, 2023

**Re: Verified Gross Savings Specification – Statewide LMI Portfolio:
Existing Affordable Multifamily Buildings**

Verified Gross Savings Specification	
Date of Implementation Plan Filing	November 1, 2023
Initiative Name	Statewide LMI Portfolio: Existing Affordable Multifamily Buildings
Initiative Description	<p>Up to the launch of the Affordable Multifamily Energy Efficiency Program (“AMEEP”) on November 3, 2021, existing affordable multifamily buildings were served through both utility-administered programs and NYSERDA-administered programs. Through the Clean Energy Fund (“CEF”), NYSERDA administered the Multifamily Performance Program (“MPP”), RetrofitNY, and Real Time Energy Manager (“RTEM”) throughout the State, including in territories that had a separate utility-administered multifamily program. Additionally, NYSERDA administers a Technical Services program (“FlexTech”). Con Edison* and NYSEG/RG&E each offered financial incentives for approved equipment upgrades by measure for affordable multifamily buildings. National Grid (KEDLI, KEDNY, and Niagara Mohawk) offered a market-rate program that included affordable multifamily buildings as well. Each of these utility programs differed slightly in measures offered and incentive structure.</p> <p>In 2021, the Program Administrators launched AMEEP, a coordinated statewide program, to meet the State’s and the Program Administrators’ objectives for energy efficiency in the affordable multifamily sector. AMEEP provides a consistent framework across the State whereby all existing affordable multifamily building owners, developers, and their representatives have access to financial incentives for energy efficiency upgrades via two program pathways: (1) a “Comprehensive Pathway,” which encourages whole-building energy retrofits; and (2) a “Non-Comprehensive Pathway” for customers who are interested in smaller, measure-level upgrades. Utilities are funding the measure installation incentives for AMEEP and serve as the main point of contact for customers applying to the program. AMEEP includes a technical assistance offering, provided and funded through NYSERDA’s FlexTech program, which helps inform capital planning for building owners to achieve greater energy efficiency savings.</p> <p>*Con Edison’s Multifamily program included sub-program initiatives focused on New York City Housing Authority (NYCHA) and Westchester County Housing Authorities (WCHA) customers.</p>

<p>Gross Savings Methodology</p>	<p>Programs in this initiative claim annual MMBtu savings. Initiative savings are realized and reported in program-level Scorecards, as MWh energy and MW peak demand savings for electric and MMBtu energy savings and peak MMBtu reductions for fossil fuels (including natural gas).</p> <p>In general, the Program Administrators rely on the TRM and best practices to estimate savings and achieve VGS goals. For prescriptive measures, details of existing conditions in LMI customer residences may be substituted for parameters in the TRM to calculate savings. The TRM currently contains language describing this methodology. Further, program manuals such as the AMEEP Program Manual contain guidance for providing information about existing conditions to be used in savings calculations. Additionally, baseline studies or other evaluation data are leveraged, where available, to calculate an average existing condition baseline that approximates the type and age of equipment currently installed by LMI customers. In the future, these baseline assumptions will be directly documented in the TRM. For custom measures, project-specific existing condition baselines are used.</p>
<p>Realization Rate (RR)</p>	<p>Due to recent and ongoing evaluation efforts, each utility- and NYSERDA-administered program is using existing program-specific RRs, where available, for the 2020 and 2021 program years, until the evaluation of AMEEP. In the case of AMEEP, where Program Administrators are jointly operating the program using a statewide framework, Program Administrators are collaborating to perform a statewide evaluation of the program, and will use AMEEP RRs from January 1, 2022 onwards.</p> <p>As discussed in more detail in the VGS Spec for Con Edison's Multifamily program, the Con Edison-administered program was using the following AP RRs:</p> <ul style="list-style-type: none"> • Lighting MWh: 46% • Lighting MW: 36% • Energy Management System (EMS)^ MMBtu: 100% • EMS Peak MMBtu: 100%* <p>These AP RRs were premised on adopting evaluation-recommended changes at the measure level and were effective from January 1, 2020 to June 30, 2021.</p> <p>The Multifamily gas (non-EMS) portion of the program had initial VGS RRs (75% for MMBtu and 53% for peak MMBtu) from the impact evaluation of the 2020 program year (<i>Multifamily Gas</i></p>

Program PY 2020 Impact Evaluation, filed on December 30, 2021). These initial VGS RRs were effective from January 1, 2020 to September 30, 2021.

The Lighting and EMS portions of the Multifamily program have new VGS RRs (45% for Lighting MWh, 35% for Lighting MW, 100% for EMS MMBtu, and 100% for peak EMS MMBtu*) from the impact evaluation of the 2020 program year (*Con Edison Multifamily Program Impact Evaluation for PY 2020*, filed on June 30, 2021). These VGS RRs are applied prospectively, effective July 1, 2021 to December 31, 2021, at which point the low- and moderate-income (LMI) portion of Con Edison's Multifamily program was replaced by AMEEP.

Based on the independent evaluator's assessment of recommended programmatic changes and savings estimation approaches (*Con Ed Multifamily Gas AP RRs for Steam Trap and Air Sealing Measures Report*, filed on March 31, 2022), the Multifamily gas (non-EMS) portion of the program now has the following AP RRs:

- Gas MMBtu: 86%
- Peak Gas MMBtu: 62%

These AP RRs are premised on adopting the following evaluation recommendations at the measure level:

- For each individual steam trap project, the fraction of tested steam traps that failed open divided by the total number of tested steam traps will be applied as a savings multiplier (between 0 and 1) to any and all untested steam traps that were replaced and had savings claimed as part of the project
- For each individual steam trap project, reported savings are capped at 20% of the gas consumption associated with the steam system's end use
- For each individual air sealing project, only the floor area comprehensively air sealed will be included in the TRM's savings calculation algorithm

These recommended changes were implemented as of October 1, 2021, and the AP RRs are effective from October 1, 2021 to December 31, 2021, at which point the low- and moderate-income (LMI) portion of Con Edison's Multifamily program was replaced by AMEEP.

Multifamily program electric and gas energy savings and demand reduction will be reported at the program level based on savings-weighted RRs and updated quarterly in Scorecard reporting. No applicable RRs have been determined for non-lighting electric

measures for this program within the preceding five-year time frame.

The NYSERDA-administered **RTEM Program** (inclusive of LMI Multifamily projects) has initial VGS RRs of 20% for MWh and 42% for MMBtu based on the impact evaluation for program period 2017-Q1 2020. An update to this study was finalized in Q2 2023 but did not include multifamily projects. No applicable RRs have been determined for **RetrofitNY** or **FlexTech** within the preceding five-year time frame.

The **NYSEG/RG&E Multifamily program** evaluation studied program years 2019 and 2020 and led to the following VGS RRs for LMI multifamily participants:

- kWh RR: 108%
- kW RR: 101%
- Gas Therm RR: 95%

Evaluators quantified LMI and non-LMI VGS RRs for informational purposes.

^For purposes of Verified Gross Savings, the Energy Management System and Advanced Boiler Control TRM measures should be considered equivalent.

*Peak MMBtu was not specifically evaluated. The MMBtu RR is used for this metric with concurrence by the evaluator.

Planned VGS Approach	<p>A Gross Savings Analysis for Con Edison’s Multifamily program Non-Lighting Electric measures is currently underway and is expected to be completed by Q4 2023 with an EM&V Plan filed in Q1 2023. These RRs will be applicable to the affordable track of Con Edison’s Multifamily program through December 31, 2021.</p> <p>NYSERDA’s MPP will undergo Gross Savings Analysis for program period Q3 2018-2022 and details related to the Gross Savings Analysis methodology will be submitted in an EM&V Plan in Q1 2024. NYSERDA will competitively procure an independent evaluator to perform the Gross Savings Analysis in 2023 and anticipates that results will be available by late 2024 or early 2025. Evaluation for RetrofitNY is anticipated on the same timeline. An RTEM evaluation was finalized and filed in Q4 2021. An update to the RTEM evaluation was finalized in Q2 2023.</p> <p>To evaluate the Gross Savings for the 2019-2020 program period, an impact evaluation was conducted on NYSEG/RG&E’s Multifamily Program, which distinguished between LMI and non-LMI customer bases. The evaluation concluded in December 2021, results were presented in January 2022, and the report was filed on March 31, 2022. The evaluators did not propose an AP RR; however, the program went through substantial changes in measure offerings and implementation approach in 2022. NYSEG/RG&E conducted a process evaluation for the 2022-2023 program period that concluded in August 2023 with results presented in September 2023. The report will be filed by December 2023.</p> <p>In addition to Program Administrator-specific evaluation activities, the Joint Utilities and NYSERDA are:</p> <ul style="list-style-type: none"> • Collaborating to develop statewide and regional average existing condition baselines, where applicable, facilitated through the TRM Management Committee.
Exemption from EAM Status	Not exempt

Verified Gross Savings Specification

to
from
date

New York State Public Service Commission, Att: Honorable Michelle Philips, Secretary
The Joint Utilities of New York and NYSERDA
November 1, 2023

**Re: Verified Gross Savings Specification – Statewide LMI Portfolio:
Affordable New Construction**

Verified Gross Savings Specification	
Date of Implementation Plan Filing	November 1, 2023
Initiative Name	Statewide LMI Portfolio: Affordable New Construction
Initiative Description	<p>NYSERDA administers the Affordable New Construction program across the State, which provides:</p> <ul style="list-style-type: none"> • Technical assistance to projects seeking to achieve high performance energy efficiency buildings • Incentives to housing developers and builders and Residential Energy Services Network (“RESNET”)-accredited Rating Quality Assurance Providers, with incentive levels based on the performance of the building • Quality Assurance (QA) services through third parties such as RESNET-accredited Rating Quality Assurance Providers, or qualified certifiers/verifiers to one of the Passive House standards <p>In addition, NYSERDA administers the Buildings of Excellence Competition program, which seeks to identify replicable models for the design, construction, and renovation of affordable housing. Evaluation of this component is embedded within NYSERDA’s larger Affordable New Construction evaluation described within this VGS specification.</p>
Gross Savings Methodology	<p>Programs in this initiative claim annual MMBtu savings. Initiative savings are realized and reported in program-level Scorecards, as MWh energy and MW peak demand savings for electric and MMBtu energy savings and peak MMBtu reductions for fossil fuels (including natural gas).</p> <p>Energy savings are calculated by independent third-party contractors who utilize site-specific energy models to estimate savings above code.</p>
Realization Rate (RR)	<p>No applicable RRs have been determined for programs in this initiative within the preceding five-year time frame.</p> <p>For reference purposes, an initial VGS RR of 0.76 for electric savings and 0.85 for natural gas and propane were calculated for NYSERDA’s single family New Construction initiative (inclusive of</p>

	<p>LMI) for program period Q3 2016-Q2 2021. Alternative prospective RRs of 1.04 for electric savings and 1.13 for natural gas and propane were calculated for program years Q3 2021 to Q4 2022; however, per DPS VGS guidance, AP RRs cannot exceed 1.0 and reporting will only show AP RRs of 1.0. An updated VGS RR of 0.86 for electric savings and 1.04 for natural gas and propane savings were calculated for the period starting Q1 2023. These RRs were finalized in Q2 2023.</p>
<p>Planned VGS Approach</p>	<p>Program areas offering incentives are undergoing a Gross Savings Analysis for the program period 2017-2020. Independent evaluator DNV is performing the Gross Savings Analysis and details related to the Gross Savings Analysis methodology were submitted in an EM&V plan filed in Q3 2021; an updated EM&V plan was filed in Q3 2023. The single family Gross Savings Analysis (encompassing Affordable New Construction) was completed in Q2 2023 and was filed in Q3 2023.</p>
<p>Exemption from EAM Status</p>	<p>Not exempt</p>

Verified Gross Savings Specification

to
from
date

New York State Public Service Commission, Att: Honorable Michelle Philips, Secretary
The Joint Utilities of New York and NYSERDA
November 1, 2023

**Re: Verified Gross Savings Specification – Statewide LMI Portfolio:
Additional LMI Initiatives**

Verified Gross Savings Specification	
Date of Implementation Plan Filing	November 1, 2023
Initiative Name	Statewide LMI Portfolio: Additional LMI Initiatives
Initiative Description	<p>In addition to market segment-specific programming, LMI customers are served through a series of programs administered by utilities and by NYSERDA that aim to increase awareness of and access to energy efficiency and clean energy solutions across LMI market segments.</p> <p>NYSERDA, as part of the Clean Energy Fund Market Development Portfolio, administers the New York State Healthy Homes Value-Based Payment Pilot (“Healthy Homes”) and the Solar for All efforts. Both programs are designed to increase access to clean energy solutions and improve energy affordability for LMI residents and communities. NYSERDA’s Solar for All efforts have been focused on clean energy generation, not energy savings, no RR will be determined for this program, and it will not be discussed further in this Spec. NYSERDA’s Healthy Homes effort is focused on developing a replicable model(s) for implementing a healthy homes approach to residential building improvements in close coordination with NYS Department of Health. Energy savings will be verified through an upcoming evaluation as described below.</p> <p>Central Hudson’s Community Lighting program provides LED bulbs to customers that utilize services from organizations such as United Way and Food Banks.</p> <p>Con Edison offers additional programming to its LMI customers through Food Bank Bulb Distribution (“Food Bank”) as part of its Retail Lighting program. Additionally, Con Edison offers an Efficiency Starter program, which provides free kits of low-cost energy savings measures to LMI customers within their respective service territories. In 2020, Con Edison sent targeted messaging to LMI customers via Home Energy Reports (“HER”). In 2023, Con Edison incorporated the Smart Kids program into its LMI portfolio of programs and initiatives. Teachers in Title I Schools in Con Edison’s service territory may opt in to receive energy saving kits for their classes.</p> <p>National Grid provides LED bulbs to LMI customers in the Upstate New York electric service territory through a network of Food</p>

	<p>Banks and local pantries. In addition, participating customers are provided with a brochure outlining and promoting other programs and services available to LMI customers from National Grid and other statewide energy efficiency initiatives. National Grid is working in concert with NYSEG/RG&E to cover overlapping service territories.</p> <p>Orange & Rockland started offering additional programming to its LMI customers in 2022 through a Food Bank program which operates in conjunction with its Retail Lighting Program. Additionally, the Company now offers bonus incentives for low-cost energy savings measures to LMI customers who participate in the MyORU Store Marketplace Program (referred to as the LMI Marketplace program).</p> <p>NYSEG/RG&E engages directly with food banks, food pantries, and other local events within its LMI service territories to distribute selected Energy Star certified equipment and energy saving measures through the LMI Distributions program. In conjunction with the LMI Distributions program, NYSEG/RG&E works with retailers within LMI communities to lower the purchase price of LED bulbs and starting in 2023 the Company also offers lower prices on other energy saving measures (this program is known as Retail Products LMI). Also in 2023, NYSEG/RG&E started the School Kits program to distribute free energy saving kits to students upon request who meet low income qualifications. This program entails outreach to 5th grade students, teachers and parents providing education on ways to save energy in the home (including referrals to EmPower+ and AMEEP). Students are provided with interactive materials to learn about energy efficiency and given the option to take action within their own homes in coordination with their teachers and parents.</p>
Gross Savings Methodology	<p>Programs in this initiative (except Solar for All) claim annual MMBtu savings. Initiative savings are realized and reported in program-level Scorecards, as MWh energy and MW peak demand savings for electric and MMBtu energy savings and peak MMBtu reductions for fossil fuels (including natural gas).</p> <p>In general, the Program Administrators rely on the TRM and best practices to estimate savings and achieve VGS goals. For prescriptive measures, baseline studies or other evaluation data are leveraged, where available, to calculate an average existing condition baseline that approximates the type and age of equipment currently installed by LMI customers. In the future, these baseline assumptions will be directly documented in the TRM.</p> <p>For custom measures, project-specific existing condition baselines are used. Savings attributed to NYSERDA’s Healthy Homes Pilot</p>

	<p>are calculated using EmPCalc, a custom, whole-house modeling software.</p>
<p>Realization Rate (RR)</p>	<p>Due to recent and ongoing evaluation efforts, each utility- and NYSERDA-administered program is using existing program-specific RRs, where available.</p> <p>The Con Edison Retail Lighting program had initial VGS RRs (153% for MWh and 163% for MW) from the impact evaluation of the 2017 program year (<i>Residential Retail Lighting Program 2017 Database Review</i>, filed on March 31, 2019), effective from January 1, 2017 to December 31, 2019. From January 1, 2020 to September 30, 2020, Con Edison implemented the independent evaluator’s recommended programmatic changes, and used the following AP RRs:</p> <ul style="list-style-type: none"> • MWh: 100% • MW: 100% <p>In September 2020, The Retail Lighting program updated its VGS RRs (105% for MWh, 111% for MW) through the impact evaluation of the 2018 program (<i>Residential Retail Lighting 2018 Program Evaluation</i>, filed on September 15, 2020). Based on the independent evaluator’s assessment of recommended programmatic changes and savings estimation approaches, Con Edison adopted the following AP RRs for the Food Bank portion of the program, effective September 1, 2020 to February 28, 2022:</p> <ul style="list-style-type: none"> • Food Bank First-Year Annual MWh: 58%^[1] • Food Bank Lifetime MWh: 74%¹ • Food Bank MW: 58% <p>In February 2022, Con Edison completed an updated impact evaluation of the program spanning September 2020 through December 2021 (<i>Con Ed Retail Lighting and Foodbank Bulb Distribution Impact Evaluation Report</i>, filed on March 31, 2022). The Food Bank program achieved VGS RRs consistent with the AP RRs previously filed. These realization rates include the application of in-service rates (ISRs) to reported savings. Effective March 1, 2022, until completion of the next Gross Savings Analysis, Con Edison will claim the current VGS RRs, listed below, for the Food Bank program:</p> <ul style="list-style-type: none"> • Food Bank First-Year Annual MWh: 58% • Food Bank Lifetime MWh: 74%¹

- Food Bank MW: 58%

[\[1\]](#) Due to differences in in-service rates (ISRs) over time as identified in the evaluation, Food Bank bulbs should apply different RRs for first-year annual and for lifetime kWh.

As discussed in more detail in the VGS Spec for Con Edison's **HER** program, this program used the following AP RRs from January 1, 2020 through December 31, 2020:

- MWh: 100%
- Peak MW: 55%
- MMBtu: 100%
- Peak MMBtu: 100%*

The Residential Home Energy Reports program has new VGS RRs (98% for MWh, 54% for MW, 69% for MMBtu, and 69% for peak MMBtu) from the evaluation of the 2019 program year (*Home Energy Reports Program: 2019 Comprehensive Report*, filed on December 1, 2020). These VGS RRs are applied prospectively, effective January 1, 2021 until completion of the next Gross Savings Analysis. These RRs will be used for both annual and lifetime savings reporting with concurrence by the evaluator.

*Peak MMBtu was not specifically evaluated. The MMBtu RR is used for this metric with concurrence by the evaluator.

The Con Edison **Smart Kids** program has VGS RRs of 100% for annual electric (MWh) and natural gas savings (MMBtu), lifetime natural gas savings (MMBtu), and electric (MW) and natural gas peak demand savings (MMBtu) from the impact evaluation of the 2021 program year completed in December 2022 (*Con Edison Smart Kids PY2021 AP RR Impact Evaluation Report*, filed Q4 2022). The study found a VGS RR of 101% for lifetime electric savings (MWh). However, as noted in the evaluation report, NYS TRM guidance on hours of use and effective useful life (EUL) changed in Q4 2021 and remain in place in 2022. As such, the lifetime MWh VGS RR from this evaluation is not considered to be representative of 2022 performance. Accordingly, and with concurrence by the evaluator, the program adopted the following VGS RRs, effective January 1, 2023:

- MWh: 100%
- MW: 100%
- MMBtu: 100%

These RRs are used for both annual and lifetime savings reporting with concurrence by the evaluator. Additionally, these VGS RRs

	<p>are applied prospectively until completion of the next Gross Savings Analysis.</p> <p>Central Hudson’s Community Lighting program has the following initial VGS RRs, which were determined by an impact evaluation of the program by Demand Side Analytics for program period 2018-2019:</p> <ul style="list-style-type: none"> • MWh: 84.4% • MW: 75% <p>The initial VGS RRs are applied retrospectively and prospectively until the completion of the next Gross Savings Analysis. The final Evaluation Report was filed on July 1, 2021.</p> <p>No applicable RRs have been determined for NYSERDA’s Healthy Homes pilot, Con Edison’s Efficiency Starter program, Orange & Rockland’s Food Bank and LMI Marketplace programs, and NYSEG/RG&E’s LMI Distributions and School Kits programs within the preceding five-year time frame.</p> <p>The National Grid Food Bank program uses an estimated Realization Rate of 50%. This realization rate is based on the evaluation of the lighting program in Massachusetts, which was found to have a realization rate of 70%. The Massachusetts LED giveaway program was estimated to have a 50% realization rate. The New York Food Bank program, which has a similar design, is adopting the more conservative rate of 50%.</p>
Planned VGS Approach	<p>Program Administrators will continue to share learnings across the Portfolio.</p> <p>Con Edison will determine an appropriate schedule for future Retail Lighting and Residential Home Energy Reports Gross Savings Analysis.</p> <p>An impact evaluation for Con Edison’s Efficiency Starter program is forthcoming, with the evaluation plan submitted in Q2 2023. The final results are anticipated to be published by Q4 2023.</p> <p>Orange & Rockland is currently undergoing a portfolio-wide impact evaluation that will yield Gross Savings Analysis results applicable to its Food Bank and LMI Marketplace programs. The evaluation plan was submitted in Q2 2023 and a final report is anticipated to be published by Q4 2023.</p> <p>NYSERDA’s Healthy Homes pilot will undergo Gross Savings Analysis at a future date depending on the start date and progress of the pilot. NYSERDA will reassess the timeline for this work on a</p>

periodic basis, in alignment with the progress of the pilot as discussed above. The Gross Savings Analysis methodology is anticipated to consist of a bill savings analysis to be detailed in an EM&V Plan and conducted by an independent evaluator. The impact evaluation for Healthy Homes will be conducted cooperatively by NYSERDA and the New York State Department of Health to measure effects of the interventions.

National Grid’s Food Bank program will undergo a Gross Savings Analysis in the 2023/2024 timeframe. If the potential exists for participating in a statewide food bank program evaluation with other PAs, this timeline may be extended.

NYSEG/RG&E is currently undergoing a process and impact evaluation that will yield Gross Savings Analysis results applicable for its LMI Distributions Program in regard to the lighting portion of the program for the 2022 program year. The evaluation plan was submitted in Q2 2023 and the final report is anticipated to be published by Q4 2023.

NYSEG/RGE’s Retail Products LMI program has the following initial VGS RRs, which were determined by an impact evaluation of the 2022 program year:

- MWh: 101%
- MW: 77%
- Therms: 100%

The initial VGS RRs are applied retrospectively and prospectively until the completion of the next Gross Savings Analysis. The final Evaluation Report was filed on August 4, 2023.

NYSEG/RG&E will undergo a Gross Savings Analysis for its School Kit program in 2024 for the 2023 program year. An evaluation plan is expected to be submitted in Q2 2024 and a final report to be filed in Q4 2024.

Exemption from EAM Status

Not exempt