
LMI Stakeholder Forums
Summary Report
CASE 18-M-0084

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1. Introduction

In the 2018 State of the State, Governor Andrew M. Cuomo directed the NYS Department of Public Service (DPS) and NYS Energy Research and Development Authority (NYSERDA) to develop an energy efficiency target for New York State and a suite of initiatives geared at scaling the adoption of energy efficiency across New York State. In April 2018, DPS and NYSERDA published *New Efficiency: New York*, which recommends a comprehensive mix of strategies to support the adoption of energy efficiency across all sectors. These efficiency improvements will enable New York to meet an ambitious new target of 185 trillion Btus of end-use energy savings by 2025.

To solicit input on the strategies recommended in *New Efficiency: New York* and to inform the development of the comprehensive energy efficiency initiative, the DPS hosted several stakeholder forums on topics including system value of electric efficiency, access to utility data, heat pumps, and energy affordability and energy efficiency for low-to moderate-income (LMI) customers. The stakeholder forums provided an opportunity for stakeholders with relevant expertise to share input on the topical areas and make recommendations on the direction of the energy efficiency initiative. While the forums on technical and policy related topics were hosted as one-day meetings, the approach for the LMI forums varied in that there were seven forums scheduled around the state in acknowledgement of the geographic differences in priority and need of LMI residents, and the fact that many stakeholders that are active in the LMI space are unable to travel to all-day meetings due to organizational capacity constraints. In addition, DPS partnered with NYSERDA to schedule and host the forums.

This report serves as a summary of the input received at the LMI forums from stakeholders for increasing energy affordability and access to clean energy solutions for LMI residents and communities. In addition, detail on the LMI landscape is provided to add context to the issues raised in the forum summaries.

2. LMI Energy Landscape in New York State

New York's LMI market segment is broad and diverse, with more than 3.5 million households across the State.¹ LMI household characteristics vary across the State with respect to housing tenure, housing type and condition, and primary heating fuel used, all of which can contribute to a household's annual energy consumption and costs. Energy costs have a disproportionate impact on lower-income households with energy burdens² for LMI New Yorkers exceeding 20% for the lowest-income households. In addition to LMI households, the LMI energy landscape includes building owners and landlords, service providers, and program administrators who are responsible for delivering clean energy solutions to LMI households.

While lower incomes and limited access to capital are primary barriers to the adoption of clean energy solutions for LMI households, other barriers include a lack of information on available programs and resources; structural deficiencies and health and safety issues such as leaking roofs or the presence of mold and asbestos that cannot be remediated through available programs; and the split incentive for renters, in which landlords do not have an incentive to fund energy efficiency upgrades when the tenant is responsible for paying the energy bills. In addition to LMI residents, affordable housing owners also

¹ 2.3 million low-income households, defined as households with annual income at or below 60% of the State Median Income (SMI); and 1.2 million moderate-income households, defined as households with annual incomes between 60% of SMI and 80% of Area Median Income (AMI) or SMI, whichever is greater.

² The annual household energy costs as a portion of total household income.

face barriers to adopting clean energy upgrades. Affordable housing is typically administered on tight margins and it is difficult for non-profit and private owners to access capital to make improvements. In addition, limited awareness of opportunities to improve energy efficiency and access to technical support to undertake a retrofit or build to a higher performance limits the energy efficiency that has been achieved in the affordable housing segment.

New York state has a strong foundation of ratepayer and federally- funded initiatives to address energy affordability and create access to clean energy solutions for LMI residents, with over \$700 million invested each year. Budgets for these initiatives in 2017 included nearly \$600 million to help offset home heating costs for low-income households through the Home Energy Assistance Program (HEAP)³ and utility bill payment relief delivered by the utilities through the Public Service Commission's Affordability Policy.⁴ In addition, the Weatherization Assistance Program (WAP)⁵ was funded at approximately \$50 million, utilities invested approximately \$7 million in energy efficiency⁶ opportunities and REV demo⁷ projects targeting LMI, and through the Clean Energy Fund (CEF), NYSERDA invested \$70 million in initiatives targeting access to clean energy solutions for LMI residents.⁸ As a result of these investments in 2017, 1.4 million households received bill payment assistance, and nearly 16,000 received energy efficiency or weatherization services.

³ LIHEAP, a Federally funded block grant program, known in NYS as HEAP, is administered by the NYS Office of Temporary and Disability Assistance and the local Departments of Social Service. HEAP provides regular and emergency grants to help offset home heating costs, emergency heating equipment repair and replacement, clean and tune of heating systems, and a cooling program.

⁴ On May 20, 2016, the Public Service Commission issued an order adopting a universal Energy Affordability Policy, which seeks to limit energy costs for LMI New York households to no more than 6 percent of household income. The policy is primarily achieved through an enhanced utility low income discount program, which will provide monthly bill discounts to approximately 1.65 million customers, with an annual budget of approximately \$260 million.

⁵ WAP is administered by the NYS Homes and Community Renewal and delivered by subgrantees across the state. The program provides no-cost weatherization and energy efficiency services to low-income households and affordable multifamily buildings.

⁶ National Fuel administered the Low-Income Usage Reduction Program; ConEdison and National Grid administered a multifamily energy efficiency program targeting affordable housing; National Grid administered the HEAT energy efficiency program on Long Island, and PSEG-LI administered the REAP program.

⁷ Demonstration projects are a transition step in implementing REV policy changes, and are intended to inform decisions with respect to developing distributed system platform functionalities, measuring customer response to programs and prices associated with REV markets, and determining the most effective implementation of DER. These projects are also a means of presenting REV to customers and gauging their receptiveness to REV technologies, products, and services. Data collected from these projects will help inform regulatory changes, rate designs, and the most effective means to integrate DER on a larger scale.

The National Grid "Fruit Belt" REV Demo is an example of a REV demonstration project that is focusing on creating access to clean energy solutions for LMI customers. Through the demonstration, National Grid seeks to install up residential rooftop solar systems within the Buffalo "Fruit Belt" neighborhood and provide LMI customers with monthly net-metering credits.

⁸ Through the CEF, NYSERDA administers an LMI portfolio that funds initiatives that deliver energy efficiency, access to renewables, and market development initiatives geared at increasing energy affordability and access to clean energy solutions for LMI residents and communities. Specific initiatives include the EmPower NY program, which provides no-cost energy efficiency for low-income New Yorkers, the Multifamily Performance Program, which provides incentives to owners of affordable multifamily buildings to increase the building performance of their properties, and Solar for All, which provides no-cost community solar subscriptions for low-income households. See the CEF LMI Chapter for more detail on the CEF LMI portfolio. <https://www.nyserdera.ny.gov/About/Clean-Energy-Fund>.

In addition to the bill payment assistance and clean energy program investment, the New York Green Bank (NYGB) is applying and further developing financing techniques that offer LMI communities' greater opportunities to participate in, and directly benefit from New York's growing clean energy economy.⁹ The NYGB has supported several projects that increase adoption of clean energy in the LMI market segment including providing debt capital to community solar project owners, enabling subscribers to subscribe to the community solar project without credit checks; providing financing for solar developers participating in Solarize campaigns; and financing for lighting retrofits in 18 NYCHA buildings. The NYGB has also issued an RFP targeting multifamily building owners seeking to finance or purchase energy efficiency or renewable energy assets.

3. New Efficiency: New York- Opportunities for LMI Customers and Communities

Despite the significant resources invested in addressing energy affordability and access to clean energy solutions on an annual basis in New York State, New York State has fallen short in scaling energy efficiency in the LMI market segment. Over the last 12 years, energy efficiency and weatherization programs have reached ~12% of income-eligible households. Increasing the adoption of energy efficiency among LMI households and affordable building owners in New York State is essential for both lower-income residents and communities, but also for achieving the State's ambitious energy and environmental goals. Treating a home or building with energy efficiency can deliver long-term energy affordability impacts, improve health outcomes for residents, and reduce reliance of bill payment assistance over time. In addition, to reach the 2025 energy efficiency target and the 2050 greenhouse gas emissions target,¹⁰ the State must develop solutions to address the barriers that prevent LMI households and affordable building owners from adopting energy efficiency.

In the New Efficiency: New York report, the DPS and NYSERDA proposed additional strategies and interventions targeted at scaling adoption of energy efficiency in the LMI sector. These strategies include optimizing the current portfolio of LMI clean energy initiatives and building on the Clean Energy Fund by working to embed energy efficiency considerations into markets that have traditionally not focused on energy efficiency; exploring opportunities to increase the impact of ratepayer funds being administered; and consideration of inclusive finance models to increase access to energy efficiency. Specific recommendations in the New Efficiency: New York included:

- the advancement of initiatives focused on increasing the impact of ratepayer funds and increasing affordability and access to clean energy solutions across the LMI market segment;
- improving coordination of energy, housing, and social service programs at the state and local levels;

⁹ NYGB activities supporting LMI communities include debt investments to support community distributed generation ("CDG") solar projects that will (i) enroll a wide-ranging group of customers (including LMI customers) as project subscribers, (ii) participate in NYSERDA's Solar For All program, (iii) incorporate customer acquisition strategies that do not require credit scores to be provided by eligible customers, and (iv) offer short-term subscription contracts to subscribers.

¹⁰ Through the Reforming the Energy Vision (REV) initiative, New York State is addressing its goals of reducing greenhouse gas emissions 40% by 2030 from 1990 levels, and in the longer term, reducing emissions 80% by 2050.

- more profound engagement with the affordable multifamily housing sector to address pre-development, technical assistance for building owners and housing agencies, and addressing the opportunity to influence the refinance cycle;
- developing the market for Zero Energy Modular (ZEM) homes in New York State as an alternative to traditional manufactured housing or as an urban infill application;
- exploring opportunities to adopt energy efficiency upgrades as part of a healthy homes intervention under Medicaid;
- exploring inclusive finance models to increase access to energy efficiency for consumers that face barriers to traditional lending;
- dedicating at least 20% of any additional ratepayer investment in energy efficiency to the LMI market segment; and
- a requirement for NYSERDA, DPS, and the utilities to develop a comprehensive and effective approach to energy efficiency for LMI New Yorkers.

Additional context on these recommendations is available in Section 8 of the New Efficiency: New York Report.¹¹

4. LMI Stakeholder Forums

Seven stakeholder forums were held across the state between September and November 2018 to discuss LMI energy affordability and access to clean energy solutions, including energy efficiency, for LMI New Yorkers.¹² The forums provided an opportunity for DPS and NYSERDA staff to engage with interested stakeholders in addressing energy affordability and access to clean energy solutions for LMI residents and communities. The forums were attended by a total of 250 participants, representing 129 organizations including human service and community-based organizations, advocates, contractors, installers, developers, utilities, and local and state government.¹³

4.1 LMI Stakeholder Forum Process and Schedule

Similar to the stakeholder forums for the other New Efficiency: New York topic areas, the LMI forums were announced via a public notice to all following case 18-M-0084 and with direct outreach by NYSERDA to stakeholders that have been active in other low-income and affordability proceedings. The initial public notice was published on August 28, 2018 and was updated on September 18, 2018, to add a forum in Binghamton, and October 10, 2018, to postpone the North Country forum that had originally been scheduled for Malone NY, due to low attendance. The North Country forum was rescheduled for November 5, 2018 in Watertown, NY. The schedule for stakeholder forums was as follows:

Date	Location
September 20, 2018	Western NY, Buffalo
September 24, 2018	Hudson Valley, Kingston
October 9, 2018	Central NY, Syracuse
October 23, 2018	Southern Tier, Binghamton

¹¹ <https://www.nysERDA.ny.gov/About/Publications/New-Efficiency>

¹² While the forums were initiated under the Case 18-M-0084, In the Matter of a Comprehensive Energy Efficiency Initiative, referred to in this document as the “New Efficiency: New York” case, the forums were intended to discuss the broad considerations for advancing energy affordability and access to clean energy solutions for LMI residents.

¹³ A list of organizations that had representation at the forums is provided in Appendix A.

October 25, 2018	Long Island, Deer Park
October 31, 2018	New York City, Bronx
November 5, 2018	North Country, Watertown

Each forum followed a similar agenda with discussion focused on statewide policy objectives as well as the unique interests and needs of the respective region. For several of the forums, staff partnered with local organizations to develop the meeting agenda and invite stakeholders that may not otherwise have been alerted to the opportunity to participate. The standard agenda for the forums consisted of the following:

- I. Introduction
- II. Review of Low- to Moderate-Income Energy Landscape and Current Portfolio of Initiatives
- III. Group Discussion
- IV. Wrap Up

The forums were attended by staff from the DPS and NYSEDA, including staff from the NYGB. Participants were asked to RSVP prior to the forum to allow for planning of logistics. Prior to the forum, the agenda for the meeting and a list of discussion questions was provided to those that RSVP'd in order to help prompt discussion on key questions.¹⁴ Suggested discussion topics included the make-up of the ratepayer-funded LMI portfolio, opportunities for improved coordination, considerations for targeting renters or affordable building owners, community ownership of distributed energy resources, and areas for improving stakeholder engagement.

4.2 Common Themes

While the forums were attended by a diverse set of stakeholders and the discussions across the forums were grounded in regional differences in demographics, housing stock, and needs; there were consistent themes that were brought up in each of the forums. The following section summarizes the common themes that emerged from input received at the forums, as understood by NYSEDA and DPS staff. ¹⁵

1. **Energy affordability is a multidisciplinary issue.** Discussions related to reducing energy burdens and increasing access to clean energy solutions for low to moderate-income residents and communities must also include considerations for housing, health, social services, and economic development opportunities.
2. **Energy interventions should be used in a holistic manner to reduce energy burdens.** Energy efficiency, renewable energy, and bill payment assistance should be used in a complementary manner to address energy affordability. While energy efficiency should be the priority to reduce energy consumption, renewables and bill payment assistance can help to provide bill relief and address high electric loads sometimes caused, for example, by in-unit medical equipment.
3. **Coordination between programs must be improved.** Fragmented program administration results in applicants spending considerable time and effort to fill out and submit multiple applications or comply with inconsistent program requirements. In addition, applicants may not be made aware

¹⁴ See Appendix B for a list of the discussion points provided to participants prior to the forums.

¹⁵ The order in which the themes are listed does not signify relative importance.

of other programs or services that they are eligible for. A single application, automated referrals, and data sharing between State and utility programs would improve access to programs, reduce administrative burden, and enhance coordination between energy and housing programs. Further, residents and building owners should be directed to organizations able to provide information on a broad range of program opportunities that address diverse needs of LMI households.

4. **Energy affordability and housing are inextricably linked.** Housing quality affects occupant health and may predict energy performance and influence energy burden. Owner/renter status often determines whether a consumer is able to undertake clean energy improvements to reduce energy burdens. In cases where energy is included in rent, energy costs may influence rent. Reduced operating costs associated with lower energy costs may lead to the preservation of affordable housing by reducing the upward pressure on rent.
5. **Additional and equitable distribution of funding.** The size of the LMI population is greater than currently available resources; funding should be made available for building health and safety improvements; and consideration should be provided to the distribution of funds to ensure that disadvantaged communities benefit from public and private investment in their communities.
6. **Program design must consider regional characteristics and needs.** The population of New York state is large and diverse. Housing stock, climate, demographic and economic factors can vary greatly across the state and considerations for those variations should be included in program design and implementation.
7. **Workforce development and training.** It is important to provide opportunities for disadvantaged New Yorkers in the clean energy economy. To reach the state's clean energy goals, it will be necessary to expand the clean energy workforce. Workforce development programs should be designed to lead to jobs and career paths in the expanding clean energy economy.
8. **Inclusive and innovative financing.** Alternative finance mechanisms are necessary to expand access to clean energy solutions to households that cannot qualify for traditional lending. Innovative financing is necessary for mid-cycle building repairs and equipment replacement as well as for major retrofits at mortgage refinancing to preserve affordable housing and meet climate change/clean energy goals.
9. **Awareness and education** at the consumer and service provider level are necessary. Knowing about programs, resources, and the ability to make informed energy decisions are important to helping LMI households reduce their energy burden. Ensuring that human service and energy service providers are aware of programs and resources is key to making sure that LMI households can be directed towards resources to address their specific needs.
10. **Process improvements.** Increased transparency by agency staff is important to ensure that policy and programmatic decisions are informed by those that are affected by policy and programs. In addition, stakeholders spend time engaging in meetings and proceedings, and yet it is not always clear how their input is being used to develop policy and programs. The connection should be more transparent to increase stakeholders' ongoing engagement.

- 11. Support for environmental and energy goals.** Stakeholders voiced broad support of NYS environmental and energy goals, however there is a sense of urgency to start making progress immediately.

4.3 Summary of Stakeholder Forums

The forums were attended by stakeholders from across the spectrum of the LMI energy landscape including representatives from community-based organizations, non-profits, human service providers, utilities, contractors, installers, developers, advocates, and local and state government. Several of the forums included participation by community members, who were able to share their experience addressing their energy needs. In addition to the discussion at the forums, participants were also provided with an opportunity to provide input in writing, via email. Specific requests on the makeup of the ratepayer funded LMI portfolio made by the forum participants have been aggregated with requests from all of the forums and are detailed in Section 3 of this report.

The following sections provide a summary of each forum and highlights from the group discussions, as captured by NYSERDA and DPS staff.

4.3.1 Western NY Forum

The Western NY Stakeholder Forum was held in Buffalo on September 20, 2018, from 1:00pm -4:00pm at PUSH Buffalo's School 77. DPS and NYSERDA partnered with PUSH Buffalo to develop the agenda and PUSH hosted and facilitated the meeting. The meeting was attended by 45 individuals including community members and representatives from local and state government, non-profit and community-based organizations, human service providers, contractors, utilities, and foundations. The forum was structured to allow participants time to discuss their perspectives and priorities in smaller groups, organized by sector or constituency. For example, individuals who identified as low-income consumers were able to caucus as a group to identify shared values they wished to see recognized in specific policies. The other small groups that caucused included community based-organizations; contractors; public sector and agency representatives; philanthropy; and investor-owned utilities. At several points during the forum each small group presented its list of values and priorities to the larger group, with time allotted for clarifying questions from participants.

The forum also included presentations by NYSERDA on the LMI energy landscape and current portfolio of ratepayer funded LMI initiatives, the NYGB on LMI-related investments and current initiatives, and National Grid on the programs available for low-income residents. Over the course of this forum, the participants discussed a variety of issues and highlighted a number of policy and programmatic priorities, including:

- **Program application processes** can be burdensome and redundant for applicants, especially if they are applying for more than one program, do not have the time to visit the administrative office, or face mobility challenges. Most programs require the provision of the same information. One stop shop, common application and data sharing between program administrators to make the application process simpler for customers.
- Some **renters** are unable to participate in weatherization programs because the landlord either does not want to make an investment or is unwilling to sign off on work being done to the home, even if it does not require a cost share.

- Property owners may **increase rents** as a result of clean energy investments to either recover the cost of investment or as a result of the increased value of the property, thus increasing displacement and cost burdens for renters.
- **Health and safety** should be a priority for energy program investment. Several Forum participants identified the health benefits associated with energy efficiency improvements on their homes.
- Lower-income residents often struggle with the **tradeoff between spending on energy and other necessities** such as medication, food, or child care.
- The **current funding levels** for LMI energy programs are not sufficient to meet the level of need, additional funds should be allocated to LMI clean energy initiatives.
- **Workforce development and training** initiatives in the clean energy sector have been funded before, however these investments have not resulted in permanent jobs for many disadvantaged workers.
- Acknowledgement that there is an **inherent connectivity between climate, energy, housing, health, and social issues** and state programs and policy need to do a better job of making this link.
- **Information about programs and resources** are not always communicated to customers in need, indicating a need to improve awareness and education among customers and service providers.
- **Sustainability** is important and some participants suggested that the state should work with municipalities to fund offices of sustainability and tasking them with overseeing the overlap of energy efficiency programs, utility disputes, housing assistance programs, and other logistical aspects that often hold energy efficiency programs back from programmatic efficiency. This type of funding would allow municipalities to think strategically about how about how to integrate energy efficiency principles into all levels of their planning and budgeting in years to come about an office of sustainability.
- **Addressing climate change** in state policy and individual's actions was stressed as important by most of the participants.
- **Clean heating and cooling** in the form of ground source heat pumps and air source heat pumps should be included in energy efficiency projects immediately to contribute to the state's greenhouse gas goals, to help convert LMI consumers from reliance on fossil fuels, and to introduce cooling for vulnerable residents.
- **Roof top and community solar** should be integrated with energy efficiency programs in a complementary manner to further reduce energy bills for LMI households.
- The need for more **transparency in decision making** by agencies was highlighted by many participants.
- Participants expressed the need for more **accessible mechanisms for residents to provide input** on policy and program decisions. Engagement processes should be developed to ensure input is sought at the beginning of the planning process and that participants with various professional and personal experiences are engaged.
- **Access to financing** is a barrier for many lower-income New Yorkers. Applicants with high debt-to-income or low FICO scores cannot access lower-interest traditional consumer lending. To expand access to clean energy solutions, an inclusive finance mechanism is necessary.
- **Identifying how NYGB investment could help advance access to clean energy solutions** for lower-income communities and residents was identified as important to increase access and scale of adoption of clean energy solutions.

- **Community decision making**, maximizing benefits to community, and community ownership were emphasized as priorities for many of the participants.

In addition to the broader topics that the participants discussed, community members in attendance shared their experience addressing their energy needs and recounted challenges in accessing clean energy programs. PUSH Buffalo staff led participants through an “energy burden walk” exercise that explored participant’s experiences related to energy affordability. The exercise provided an opportunity for state agency and utility staff to engage with community members and better understand the challenges faced by members of the community with respect to energy and housing. Several participants explained that they had previously been unable to pay their utility bills, resulting in service disconnections during the winter. This led to challenges in finding shelter for family members, including children. Others described the barriers faced by renters when seeking to reduce their energy consumption. Some renters are unable to weatherize their home because the landlord is reluctant or unable to make the investment in improving the energy performance of the unit, or are unwilling to grant permission for the weatherization work to occur even without a landlord contribution. Other participants provided insights on lack of information on programs, where to apply, and an uncertainty on how to engage in policy and program processes.

The exercise worked to center the experiences and perspectives of community members that have been impacted by energy poverty and faced barriers accessing clean energy solutions. It also allowed for community members to understand the perspectives and vantage points of policy makers and program administrators. The interaction demonstrated benefit of engaging with the people most impacted by energy poverty and brainstorming solutions that would benefit them and others in their communities.

4.3.2 Hudson Valley Forum

The Hudson Valley Stakeholder Forum was held in Kingston on September 24, 2018, from 1:00pm - 4:00pm at the offices of Cornell Cooperative Extension of Ulster County. The meeting was attended by 23 individuals including community members and representatives of 15 organizations representing advocacy organizations, human service providers, community-based organizations, contractors, utilities, and local and state government. The first half of the meeting was structured with an introductory presentation by NYSERDA that outlined the current portfolio of ratepayer-funded LMI programs to provide participants with an understanding of the current landscape, and presentations by Central Hudson on programs that are available to low-income customers, and by the NYGB on LMI-related investments and current initiatives. The second half of the meeting was dedicated to a group discussion facilitated by NYSERDA staff. Participants discussed multiple issues and highlighted a number of policy and programmatic priorities, including:

- **Awareness and education** for residents needs to be a continual point of emphasis. While traditional outreach through public service announcements and telephone are still relevant, community-based education is also necessary to address the knowledge barrier that many residents face regarding clean energy and available programs.
- **Improved coordination and data sharing between program administrators** is necessary to facilitate cross-referral into programs and reduce administrative burden for applicants and redundancy for administrators.
- **An integrated approach for administering bill payment assistance, energy efficiency, and solar program is necessary.** While energy efficiency should be the priority, bill payment assistance and

solar should be viewed as complementary. For some residents, such as renters, bill payment assistance and access to community solar may be the only option to reduce energy bills where the landlord is not willing to undertake energy efficiency improvements.

- **Access to financing** is a barrier for many lower-income New Yorkers. Applicants with high debt-to-income or low FICO scores cannot access lower-interest traditional consumer lending. To expand access to clean energy solutions, an inclusive finance mechanism is necessary.
- **Transparency in decision making by agencies** needs improvement. Participation in stakeholder processes requires significant preparation and time from community members and it is not clear to how their input is used.
- **Improved follow up by program administrators** on applications and referrals is necessary to reduce attrition rates.
- Program administrators with energy efficiency programs should have **staff that are technically proficient in building science** if they are making decisions on what projects are funded or not.
- **Improving the efficiency of mobile or manufactured homes** requires additional solutions. Most weatherization and energy efficiency programs do not allow window replacements because the attributed energy savings is minimal. However, in manufactured housing the replacement of windows can result in greater energy savings and provide significant aesthetic improvements to the home.
- **Health and safety investments** should be a priority for energy programs. In some cases, a non-energy investment such as repairing a roof, can unlock substantial energy savings for a home. These opportunities should not be overlooked in program design.
- The **current funding levels** for LMI energy programs are not sufficient to meet the level of need, additional funds should be allocated to LMI clean energy initiatives.
- **Benefit/cost analyses** for LMI initiatives should be more lenient and should factor non-energy benefits into the equation.

4.3.3 Central NY Forum

The Central New York Stakeholder Forum was held in Syracuse on October 9, 2018, from 2:00pm -5:00pm at the Syracuse Center of Excellence. The meeting was attended by 30 individuals including community members and representatives from 20 organizations that include advocacy organizations, community-based organizations, human service providers, contractors, planners, housing agencies, utilities, and local and state government. The meeting was structured with an introductory presentation by NYSERDA that outlined the current portfolio of ratepayer-funded LMI programs to provide participants with an understanding of the current landscape, the NYGB provided an overview of LMI-related investments current initiatives, and National Grid staff then provided an overview of the relevant programs that are being administered in the region. The Alliance for a Green Economy (AGREE) also provided a discussion on the perspectives and priorities of the Energy Democracy Alliance (EDA).

Following the presentations, a group discussion facilitated by NYSERDA staff was held. Participants discussed a variety of issues and highlighted a number of policy and programmatic priorities, including:

- **An integrated approach for administering bill payment assistance and energy efficiency is necessary.** Energy efficiency should be used as a tool for stretching bill payment assistance funds. Energy efficiency provides longer term, more sustainable bill relief for low-income households, while also providing important co-benefits of health and comfort.

- **Housing and energy programs should be leveraged more effectively.** All of the projects going through the HCR administered programs (e.g. Low-Income Housing Tax Credit) should be as energy efficient as possible.
- The **coordination of programs at the local level**, similar to the Green and Healthy Homes Initiative (GHHI) pilot in Syracuse, is necessary to address needs that a single program cannot address, such as health and safety or structural deficiencies.
- For affordable housing, it is important that energy efficiency improvements can be made without the **landlord having the ability to increase rents**.
- The size of the low-income population requires **additional resources to be allocated** for energy efficiency, if scaling adoption is a priority.
- **Electrification should be a priority for LMI residents, however it must be paired with energy efficiency** to ensure that heat pumps can operate as efficiently as possible and from an affordability perspective, help address the associated increase in electric load.
- **State economic development funds should be considered for energy efficiency projects**, since energy efficiency provides economic benefits to the individual and society at large.
- **Split incentives for landlords are one of the largest barriers** to scaling energy efficiency among LMI consumers and renters.
- **Finance support such as credit enhancement or loan loss from the NYGB** could help affordable building owners include clean energy upgrades in capital improvements.
- In addition to consumer-focused awareness and education, there is a lack of **energy education for students in middle and high school** through Science, Technology, Engineering, and Math (STEM) education.
- **Land banks provide an opportunity for energy efficiency** programs to address a pipeline of homes that need energy efficiency improvements and may also be owned or purchased by lower-income residents.
- DPS or utilities should **consider how to utilize utility bill credit funding to deliver more energy efficiency** to deliver long term benefits to low-income households, rather than take a band-aid approach to reducing energy burdens.
- Program administrators need to supplement whole-house energy efficiency with other **light-touch interventions, such as direct install** in order to increase the number of residents served. Not every home is a good candidate for comprehensive energy efficiency and focusing on those homes will result in lost opportunities for incremental energy efficiency gains.
- **Workforce development** models such as the hiring hall model employed by PUSH Buffalo should be scaled to create access to a workforce necessary to deliver energy efficiency improvements.
- Consideration needs to be given to how **utilities are held to meeting their goals**, including the potential for penalties.
- **Section 8 properties** are usually older housing stock and do not have minimum energy efficiency requirements. Thought has to be put into how Section 8 housing can be made to be more energy efficient.

The perspectives provided by AGREE included a summary of recommendations to the DPS and NYSERDA by the EDA, which include:

- At least 40% of spending on energy efficiency measures should benefit low-to-moderate-income households.
- Energy efficiency must be accessible regardless of credit score, utility bill payment history, or upfront capital; inclusive finance models are necessary.

- Energy efficiency should not further drive housing displacement through higher rent or energy bills.
- Combine energy efficiency with Integrated Pest Management and mitigation of mold, lead, asbestos, radon, etc.
- Hold utilities accountable to goals, including through penalties. In the event that utilities are rewarded for efficiency, it's critical for low-income communities to share in the benefits.
- Energy efficiency measures should be implemented through transparent, equitable and accountable partnerships with community organizations.
- More accountability among agency staff is necessary. The time commitment of members of vulnerable communities to participate in proceedings and working groups should be recognized and inform policies that impact the communities.

In addition to those that attended in person, an additional 97 residents that were unable to attend the meeting filled out postcards expressing their interest in the New Efficiency: New York proceeding and outlining several policy priorities:

- Programs be accessible for low- and moderate-income households regardless of household credit score, utility bill payment history, or upfront capital.
- Ensure that 40% of spending on energy efficiency measures goes to initiatives and projects that benefit low-to moderate-income ratepayers.
- Implement measures through transparent, equitable and accountable partnerships with community organizations.
- Take a “holistic and healthy homes” approach that addresses the multiple stressors of living in inadequately insulated housing.

4.3.4 Southern Tier Forum

The Southern Tier Stakeholder Forum was held in Binghamton on October 23, 2018, from 11:00am - 2:00pm at the United Presbyterian Church of Binghamton. DPS and NYSERDA partnered with the Binghamton Regional Sustainability Coalition (BRSC) and Citizen Action to develop the agenda and BRSC, Citizen Action, Binghamton Community Power, and the Presbyterian Church hosted the meeting. The meeting was attended by 32 individuals including community members and representatives from local and state government, non-profit and community-based organizations, human service providers, contractors, and utilities. The forum was facilitated by BRSC and Citizen Action and structured to allow participants time to discuss their perspectives and priorities in smaller groups.

The forum was kicked-off with perspectives on energy affordability with a discussion on resident experiences and was followed by an overview of priorities from BRSC and the EDA, an overview of current LMI initiatives by NYSERDA, and with a group discussion facilitated by NYSERDA to round out the agenda. From the BRSC and EDA perspective it was important to address the following at the forum:

- share experiences related to energy affordability and accessing clean energy solutions in the Southern Tier;
- share perspectives on energy affordability in general;
- connect energy efficiency with other relevant issues; and
- and discuss shared goals for energy efficiency initiatives going forward.

Forum participants discussed a variety of issues and highlighted a number of policy and programmatic priorities, including:

- Lower-income residents often struggle with the **tradeoff between spending on energy and other necessities** such as medication, food, or child care.
- **Advocates spend time and resources participating** in stakeholder meetings but it isn't clear how their input is reflected in program decisions.
- **Energy efficiency is linked to housing**, so approaches for energy efficiency must consider housing improvements such as addressing structural deficiencies, electrical wiring, and health and safety issues.
- An organization that can serve as a **one-stop-shop** for information on programs and resources, economic development and workforce opportunities, and connect stakeholders in academia, small business, and technology or innovation would help improve program participation and local economic development opportunities.
- **Additional methods of identifying LMI residents are necessary.** How are LMI customers being identified? **Community partnerships** can help to identify LMI populations that are not currently being enrolled into programs.
- **Advocates want to get involved** and encourage participation in programs and advance policy, they just want more guidance on how they can help.
- **Additional resources are necessary** to address the large need for energy efficiency improvements in the LMI space. Current energy efficiency and weatherization programs are only able to address a fraction of those eligible.
- Negative experiences with state agencies and utilities can create a sense of **distrust among LMI residents and communities.**
- **Awareness of programs and resources** needs to be improved in the Southern Tier. There are many residents that are unaware of available programs, this is the first barrier to participation.
- **Landlords need appropriate carrot and stick** to encourage their participation in clean energy programs. Can penalties be established to address instances where landlords do not improve their rental properties?
- **Engagement opportunities**, such as these forums -need to be developed in a way that is more accessible to residents. Many lower-income residents do not have the time or access to travel to participate in these forums.

In addition to those that attended in person, an additional 70 residents that were unable to attend the meeting filled out postcards expressing their interest in the New Efficiency: New York proceeding and outlining several policy priorities:

- Programs be accessible for low- and moderate-income households regardless of household credit score, utility bill payment history, or upfront capital.
- Ensure that 40% of spending on energy efficiency measures goes to initiatives and projects that benefit low-to moderate-income ratepayers.
- Implement measures through transparent, equitable and accountable partnerships with community organizations.
- Take a “holistic and healthy homes” approach that addresses the multiple stressors of living in inadequately insulated housing.

4.3.5 Long Island Forum

The Long Island Stakeholder Forum was held in Deer Park on October 25, 2018, from 1:00pm -4:00pm at the United Way of Long Island. The meeting was attended by 36 individuals from 15 organizations representing community-based organizations, human service providers, affordable housing developers, contractors, utilities, and local and state government. The meeting was structured with an introductory presentation by NYSERDA that outlined the current portfolio of ratepayer-funded LMI programs to provide participants with an understanding of the current landscape, the NYGB provided an overview of LMI-related investments and current initiatives, PSEG- Long Island and National Grid staff then provided an overview of the relevant programs that are being administered in the region. A group discussion facilitated by NYSERDA staff was held to identify key issues salient among LMI stakeholders on Long Island. Participants discussed a variety of issues and highlighted a number of policy and programmatic priorities, including:

- **Residents on Long Island do not have access to the same types of programming available in the rest of the state** because Long Island residents do not pay into the Clean Energy Fund.
- **Increased coordination between utilities and state agencies** is necessary to increase the impact of programs. A single program or combined application that addresses electric, gas and deliverable fuels would be most effective for LMI residents. In the absence of a single program, better alignment between National Grid and PSEG would help customers as well as contractors.
- There is an **inequity for households that are just over the income thresholds** for low-income programs. While some programs are available for moderate-income residents, there are many households that become ineligible for sizeable benefits because they have incomes barely over the thresholds.
- **Increased education and awareness** is necessary to ensure customers and landlords are aware of programs, resources, and energy literacy.
- Resources are necessary to address **health and safety and structural deficiencies** in homes.
- **Aggregating energy efficiency** at the neighborhood or block level offers the potential to increase uptake, reduce customer acquisition costs, and cost per unit.
- **Convincing landlords to make clean energy upgrades** is one of the largest issues that contractors and service providers on Long Island face. In Long Island, there are many single-family homes that are rented and property owners have no incentive to make energy efficiency improvements.
- **Electrification should be a priority for LMI residents, however it must be paired with energy efficiency** to ensure that heat pumps can operate as efficiently as possible and from an affordability perspective, help address the associated increase in electric load.
- **More incentives are necessary for heat pumps** for LMI projects to offset the cost premium.
- **Non-energy benefits should be monetized** and included as benefits resulting from clean energy program investment.
- **Community solar**, while relatively new on Long Island, presents an opportunity for low-income customers to access renewable energy. Rooftop solar is too costly and many older homes have roofs that would need repair before solar can be mounted.
- Addressing **Section 8** housing is necessary, however property owners must be convinced to increase the energy efficiency of the buildings and not required. Housing advocates are concerned that a requirement to improve the energy performance of Section 8 units would lead to many Section 8 property owners dropping out of the program and limited the availability of affordable housing units.

- **Mobile or manufactured** homes require a different approach than traditional single family or multifamily homes.
- **Time of use rates** can have a disproportionate impact on lower-income customers.
- **Property Assess Clean Energy (PACE)** financing provides an opportunity to increase access to financing for LMI projects, however PACE financing requires municipal action.
- **Simplified access to energy consumption data** by service providers would allow energy efficiency improvements to be better targeted at homeowners and expedite the audit and modeling process.

4.3.6 New York City Forum

The New York City Stakeholder Forum was held in the Bronx on October 31, 2018, from 10:00am -1:00pm at the Association for Energy Affordability (AEA). The DPS and NYSERDA partnered with AEA and the New York City Environmental Justice Alliance (NYC-EJA) to develop the agenda. The meeting was attended by 67 individuals from 36 organizations that include advocacy organizations, community-based organizations, human service providers, contractors, installers, planners, housing agencies, utilities, and local and state government.

The meeting was structured with opening comments from AEA; an introductory presentation by NYSERDA, the NYGB, National Grid, and Con Edison that outlined the current portfolio of ratepayer-funded LMI programs to provide participants with an understanding of the current landscape; and perspectives on the intersection of clean energy and environmental justice by NYC-EJA, UPROSE, and WE-ACT. Participants from environmental justice organizations referenced case studies and experience within their communities to highlight the need for comprehensive energy efficiency solutions while expressing frustration with lack of progress in collaboration with utilities and state agencies.

Following the presentations, a group discussion facilitated by NYSERDA staff was held. Participants discussed a variety of issues and highlighted a number of policy and programmatic priorities, including:

- **Affordable multifamily housing** needs to be a priority. Additional incentives, as well as complementary interventions such as addressing pre-development, underwriting to savings, and supporting mid-cycle financing of clean energy as part of capital improvements.
- **An integrated approach for administering bill payment assistance and energy efficiency** is necessary. Energy efficiency should be used as a tool for stretching bill payment assistance funds. Energy efficiency provides longer term, more sustainable bill relief for low-income households, while also providing important co-benefits of health and comfort.
- **Improved coordination and data sharing between program administrators** is necessary to facilitate cross-referral into programs and reduce administrative burden for applicants and redundancy for administrators. Some states have integrated their ratepayer funded programs and their federally funded programs to remove administrative burdens and make it easier for applicants to receive services.
- Better alignment of **environmental justice** needs and energy policy is necessary. Stakeholders identify the Governor’s Environmental Justice and Just Transition working group as an opportunity for agencies to engage with stakeholders on environmental justice issues.
- **Workforce training opportunities**, especially those leading to jobs need to be prioritized for residents of lower-income or otherwise disadvantaged communities.

- **Additional funding allocations should be more in-line with the proportion of LMI residents** in the state. Rather than 20% of funding, the budget for LMI initiatives should be closer to 40%.
- **Program design should consider the demographics and housing characteristics on a regional basis.** NYSERDA's residential programs have not been able to adequately serve 1-4 family buildings in NYC. The heat island effect in NYC can exacerbate health issues for many residents and program and policy design should address the need for cooling in NYC.
- **The current threshold for moderate income** is a significant barrier because if an applicant is a few dollars over the low-income threshold they no longer are considered to be income eligible and they are required to provide a large cost-share.
- **Referral and packaging** services to help residents identify resources and programs have been effective in the past. These services were previously funded under HEAP, but are no longer funded.
- **Resilience and adaptation** should be a priority in communities that are more susceptible to flooding and other climate events.
- Solutions for addressing access to clean energy **solutions in disadvantaged communities must be developed and implemented with a sense of urgency** to address the immanent impacts of climate change.
- Clean energy solutions for environmental justice and otherwise disadvantaged communities **should be considerate of disproportionate environmental and economic harm** that the communities face (e.g.: extreme weather vulnerability to gentrification pressures). In addition the solutions should be developed and implemented in collaboration with communities that they seek to serve.
- **Electrification should be a priority for LMI buildings**, however it must be paired with energy efficiency to ensure that heat pumps can operate as efficiently as possible and from an affordability perspective, help address the associated increase in electric load. Consider third party ownership of heat pumps.
- **Finance support such as credit enhancement or loan loss from the NYGB** could help affordable building owners include clean energy upgrades in capital improvements.
- **Coordination between the City and State programs** could be improved to leverage resources and point buildings and residents to the right programs. New York City is committed to affordable housing and is looking for opportunities to advance deeper energy savings in these buildings.
- **Addressing rent increases** associated with clean energy improvements must be addressed. NYSERDA could work with NYS Homes and Community Renewal and utilities to share information on buildings receiving incentives.
- Funding for **health and safety** should be increased.
- **Transparency in agency decision making** should include a way for stakeholders to understand how their input is used.
- NYSERDA and DPS should **review already existing reports and recommendations** to identify solutions that have already been vetted and supported by stakeholders across sectors who have experience with the LMI energy efficiency landscape. Examples include reports from the CEAC LMI Working Group and Green Jobs Green New York LMI Working Group.
- **Coordination across proceedings and policy decisions** is necessary. There may be decisions made in one proceeding that have impact on others, and there are different agency staff involved in each, making it difficult for alignment.

- **An integrated approach for administering bill payment assistance, energy efficiency, and solar program is necessary.** While energy efficiency should be the priority, bill payment assistance and solar should be viewed as complementary. For some residents, such as renters, bill payment assistance and access to community solar may be the only option to reduce energy bills where the landlord is not willing to undertake energy efficiency improvements.
- **Inclusive financing options** are necessary to expand access to clean energy solutions for customers that are unable to access traditional lending.
- Utilities and NYSERDA should be strongly encouraged to **test new approaches** to creating access to clean energy solutions for LMI customers through small scale pilots.
- **Market segmentation** that includes building counts, not just units, would help aid in intervention and program planning.

In addition to those that attended in person, an additional 35 residents that were unable to attend the meeting filled out postcards expressing their interest in the New Efficiency: New York proceeding and outlining several policy priorities:

- Programs be accessible for low- and moderate-income households regardless of household credit score, utility bill payment history, or upfront capital.
- Ensure that 40% of spending on energy efficiency measures goes to initiatives and projects that benefit low-to moderate-income ratepayers.
- Implement measures through transparent, equitable and accountable partnerships with community organizations.
- Take a “holistic and healthy homes” approach that addresses the multiple stressors of living in inadequately insulated housing.

4.3.7 North Country Forum

The North Country Stakeholder Forum was held in Watertown on November 5, 2018, from 12:00pm - 3:00pm at the Community Action Planning Council of Jefferson County. The meeting was attended by 18 individuals from 6 organizations that include community-based organizations, human service providers, contractors, utilities, and local and state government. The meeting began with an introductory presentation by NYSERDA and National Grid that outlined the current portfolio of ratepayer-funded LMI programs to provide participants with an understanding of the current landscape. Following the presentations, a group discussion facilitated by NYSERDA staff was held. Participants discussed a variety of issues and highlighted a number of policy and programmatic priorities, including:

- **Coordination at the local level** is important to connect residents and projects with wrap-around funding, however contractors and human service providers are not always aware of available resources or program opportunities.
- **Improved coordination and data sharing between program administrators** is necessary to facilitate cross-referral into programs and reduce administrative burden for applicants and redundancy for administrators.
- Program administrators should **prioritize increasing the impact of existing programs and funds.**
- **Funding for addressing health and safety and structural deficiencies** should be increased. In some cases, funding issues like remediating knob and tube wiring or fixing a roof leak can unlock energy savings that would not have been realized otherwise.

- **Waiting lists** for weatherization services should be addressed by increasing coordination between NYSERDA and HCR.
- **Program announcements** including changes, should be communicated to all organizations that serve LMI residents to ensure that organizations can be prepared for any possible changes.
- **Space heating is the primary energy end use** in the North Country and energy efficiency is the most effective way to address energy burdens for LMI residents.
- **Community solar projects** should be required to allocate a specific portion of generation to LMI households.
- **Targeting energy efficiency** to higher energy users should be a priority.
- **Advocates spend time and resources participating** in stakeholder meetings but it isn't clear how their input is reflected in program decisions.
- **Energy efficiency is linked to housing**, so approaches for energy efficiency must consider housing improvements such as addressing structural deficiencies, electrical wiring, and health and safety issues.
- **Strategies to address split incentives** for landlords are necessary to increase adoption of energy efficiency in LMI and rental market segments.
- **Cross training within the trades** to consider energy efficiency is important. There are instances where plumbers or electricians may disturb or remove insulation in the course of making repairs and they do not adequately replace the insulation, resulting in breaching thermal boundaries and drafts.
- Increasing **awareness** of energy efficiency and program opportunities among **case workers and other human service professionals** that conduct house visits can increase referral of eligible households for energy efficiency services.
- **Solar thermal water heating** is efficient and should be included in mix of LMI interventions.
- **Heat pump installers** are difficult to find in the North Country.

Specific requests on the makeup of the ratepayer funded LMI portfolio made by the forum participants have been aggregated with requests from all of the forums and are detailed in Section 3 of this report.

5. Stakeholder Input

The forum series was designed to provide stakeholders with an opportunity to provide input and share their insight and considerations for addressing LMI energy issues. At each of the forums, stakeholders identified a number of program and policy priorities for LMI energy initiatives based on their experiences as consumers, practitioners, administrators, or advocates in the LMI sector. There were many questions and comments on current programs, substantial discussion at each of the forums, as well as items that should be considered to increase energy affordability and access to clean energy solutions.

Based on the discussions and priorities identified by stakeholders, it is evident that most parties agree that addressing energy affordability and access in the LMI market segment is a multifaceted endeavor with considerations that span funding allocations, equity, housing quality, awareness and education, access to finance, environmental justice, coordination between programs, and stakeholder engagement. Forum participants universally agreed that there was not a single approach to reducing energy burden and scaling adoption of clean energy solutions, there are multiple paths that need to be addressed in parallel.

The following sections present a summary of the specific input received for improving energy affordability and access to clean energy solutions, compiled from the series of forums. Some stakeholder requests may have been articulated with slight differences from meeting to meeting, as such, the summary below seeks to recount the specific requests as understood by NYSERDA and DPS staff, in a consolidated manner. Across the forums, there were discussions on many topics including open ended questions and questions on current programs. To the extent possible, NYSERDA and DPS staff captured specific requests made at the forums. The requests are arranged in a way that presents the key issues and considerations in a streamlined manner. Some requests are beyond the sole jurisdiction of the NYS Public Service Commission (PSC), DPS, or NYSERDA and would require action of other program administrators or coordination at the state agency and local levels to implement the suggested actions.

5.1 Funding and Impact of Funding for LMI Clean Energy Initiatives

1. While the New Efficiency: New York proposal recommends that a minimum of 20% of new ratepayer funds be allocated to LMI, additional funds are necessary to increase the number of LMI households adopting clean energy services. At least 40% of allocated funds should be directed to benefit low-to-moderate-income households.
2. Increased funding to address health and safety and structural deficiencies in homes, in conjunction with energy upgrades, is necessary. In many cases, additional investment to address deficiencies can open the possibility of achieving energy efficiency potential that would not be possible.
3. Utility bill discounts should be leveraged to promote energy efficiency. While bill discounts will reduce household energy burden, the relief is temporary. Focusing these resources towards energy efficiency will provide longer term affordability impacts for low-income customers and reduce costs to ratepayers over the long term.
4. Benefit/cost analysis for LMI programs should be more lenient and/or include non-energy benefits to capture the full value of the benefits derived from the investment.

5.2 Clean Energy Program Design

5. Program design should consider and address regional differences in housing stock, climate, and demographics across the state.
6. Reduction in energy waste and reducing energy burdens should be the primary goals of LMI clean energy initiatives.
7. An integrated approach for administering bill payment assistance, energy efficiency, and solar program is necessary. While energy efficiency should be the priority, bill payment assistance and solar should be viewed as complementary. For some residents, such as renters, bill payment assistance and access to community solar may be the only option to reduce energy bills where the landlord is not willing to undertake energy efficiency improvements.
8. Ratepayer-funded programs should address multifamily buildings in a comprehensive manner by focusing on both central system improvements as well as envelope and in-unit upgrades.

9. Environmental Justice considerations and input from community members most affected by impacts of energy poverty and environmental hazards should be included in program design and implementation.
10. As a measure of climate adaptation, resilience and sustainability should be factored into LMI program design. While considerations for resilience might vary by geography and climate, focusing early attention on multifamily buildings and assisted living facilities in areas of the state that are prone to flooding is recommended.
11. NYSERDA and the utilities should include direct install or other light-touch measures in order to expand the reach of energy efficiency programs to residential properties that may face barriers to comprehensive energy efficiency retrofits.
12. NYSERDA or the utilities should consider aggregation of LMI energy efficiency projects to reduce the cost of administration.
13. Solar (rooftop and community) should be integrated with an energy efficiency offering to increase impact for low-income residents.
14. Windows should be allowed as an eligible measure in energy efficiency programs for mobile homes. Replacement windows can significantly reduce thermal loss based on poor performance of older mobile home windows.
15. Electrification for LMI residents should be a priority, paired with energy efficiency. Heat pump adoption in the LMI market segment should begin with the conversion of electric resistance heat to heat pumps.
16. NYSERDA and the utilities should consider how to provide some level of assistance to households that are just over the income thresholds to qualify for program subsidy.
17. Third party ownership of clean energy assets, such as geothermal loop fields, could help address cost barriers for LMI residents and lead to adoption of clean energy solutions. NYSERDA should explore this opportunity for the LMI market segment.
18. LIPA customers do not pay into the Clean Energy Fund and are not eligible to participate in most CEF programs. The state should identify opportunities for replicating the programs available for the rest of the state on Long Island.

5.3 Coordination

19. A single point of entry or streamlined program application process is required to reduce administrative burden placed on applicants and can facilitate the auto referral of applicants into other relevant programs. The state should begin the streamlining by creating a single program platform for LMI clean energy initiatives.
20. State agencies and utilities should develop a protocol for sharing data relevant to customer participation in programs to facilitate a streamlined application process and auto referral.

21. Income documentation and application processes should be better aligned for programs.
22. The state should work with municipalities to facilitate more efficient coordination of local housing funds and other resources with clean energy funds to comprehensively treat residential properties.
23. A referral and packaging entity is an are effective coordination model, however the state currently does not fund this type of program. NYSERDA should work with other state agencies to identify options for funding this service.
24. Interagency coordination and coordination between agencies and stakeholders is critical to addressing challenging issues. The Governor has created an Environmental Justice and Just Transition working group and DPS staff should participate in those conversations.

5.4 Stakeholder Engagement and Regulatory Process

25. Public comment processes need to accommodate community-level engagement and be more accessible to residents that may not be well versed on topics to still provide input for consideration.
26. State agencies should provide transparency into the decision-making process. Typically, stakeholders are not made aware of whether or how their input is used. Where input is not incorporated, agencies should provide rationale.
27. Program administrators should design solutions to energy affordability and access to clean energy solutions in collaboration with residents and communities that the initiatives will seek to serve.

5.5 Workforce Development & Training

28. Workforce development and training should result in jobs and increased career opportunities.
29. Contractor network development is necessary in rural areas, people want to hire local contractors to do work and need trained and qualified local contractors.
30. NYSERDA should promote building science training across trades. In the course of their work, electricians, plumbers, and other tradespeople can influence the energy performance of homes.
31. NYSERDA should develop a program to incorporate energy education for students in middle and high school through Science, Technology, Engineering, and Math (STEM) education.

5.6 Affordable Housing

32. Energy costs are typically considered to be part of overall housing costs. Where heat is included in rent, the tenant does not have a separate heating bill and these costs are often overlooked by programs that provide bill payment assistance even though the cost for heating is being passed through to the tenant as a component of the rent. As such, shelter burden needs to be considered a priority, along with energy burden.

33. NYSERDA, utility, and housing agencies should develop a process to prevent affordable property owners from increasing rents solely as a result of carrying out energy efficiency improvements that are incentivized with government or utility funds.
34. NYSERDA should work with HCR to ensure that affordable housing receiving state subsidy are as energy efficient as possible.
35. Energy efficiency program funds should target Section 8 housing, as a way to improve the efficiency of rental units that may not otherwise treated with efficiency upgrades.
36. Work with land banks across the state to improve the energy efficiency of properties being purchased by lower-income households.

5.7 Awareness and Education

37. NYSERDA should develop a one stop shop model to connect residents with resources and training opportunities, and spur economic development at the local level.
38. To avoid confusion about the different clean energy programs and various program administrators, NYSERDA and the utilities should consider coordinating outreach and co-branding to present the various program offerings in a cohesive and easy to understand format across all utility service territories.
39. NYSERDA and the utilities should ensure that information on program and opportunities is made available to human service providers, contractors, and other trusted members of communities that may be in a position to refer clients into relevant programs.

5.8 Community Decision Making and Ownership of Distributed Energy Resources (DER)

40. The state should develop and provide assistance to enable local ownership of DER to facilitate local decision making, economic development, and maximizing benefits for lower-income or disadvantaged communities.

5.9 Utility Regulation

41. The PSC should incentivize and hold the utilities accountable with penalties if necessary, for achieving affordability outcomes.

5.10 Financing & Integration of Third-Party Capital

42. NYSERDA and the NYGB should develop financing products, such as credit enhancements, to enable third party investment in clean energy solutions for affordable housing and lower-income communities.
43. Inclusive finance models are important to increase access to clean energy solutions among customers that face barriers to traditional lending. NYSERDA, DPS, and utilities should develop and pilot an inclusive finance model.
44. The state should work with philanthropy to increase investment in LMI projects.

6. Summary and Next Steps

The discussion from the forums outlined here will inform the development of the suite of ratepayer funded LMI initiatives geared at addressing energy affordability and access to clean energy solutions in support of New Efficiency: New York, and beyond. NYSERDA and DPS staff will work with the utilities to consider the input received in developing a comprehensive initiative to increase energy affordability and scale energy efficiency in the LMI market segment. Many of the 44 stakeholder requests require consideration and action of multiple decision makers, for example addressing rent stability is an issue that the energy agencies cannot address alone, staff at NYSERDA and the DPS will work with the relevant agencies and organizations that will be necessary to make progress on these subjects.

Appendix A: Participating Organizations

Representatives from the following organizations participated in the series of LMI stakeholder forums:

- Acadia Center
- Adults & Children with Learning & Developmental Disabilities
- Adirondack North Country Association
- Affordable Housing Partnership
- Alliance for a Green Economy
- American AWS Corp
- Applied Public Policy Research Institute for Study and Evaluation
- Association for Energy Affordability, Inc.
- Building Performance Institute
- Bright Power
- Buffalo City Mission
- Buffalo Local Initiatives Support Corporation
- Center for NYC Neighborhoods
- Central Hudson Gas & Electric Corporation
- Central New York Regional Planning & Development Board
- CGI
- Citizens for Local Power
- Clean Energy Works
- CleaResult
- CMC Energy Services, Inc.
- Community Development Corporation of Long Island
- Community Foundation for Greater Buffalo Larkin at Exchange
- Consolidated Edison
- Cornell Cooperative Extension of Dutchess County
- Cornell Cooperative Extension of Yates County
- Cowles & Company Contracting
- Crown Heights Jewish Community Council
- Edgewise Energy
- El Puente
- Energy Conservation Specialists, LLC
- Energy Haus
- EN-Power Group
- En-Tech Associates, Inc
- Erie County Environment & Planning
- Greater Syracuse Land Bank
- Green & Healthy Homes Initiative
- Green Audit USA
- Harlem Community Development Corporation

- Home Headquarters, Inc.
- Housing Conservation Coordinators, Inc
- Interfaith Work CNY
- Jefferson County Office for the Aging
- Long Island Cares
- Margert Community Corporation
- Mohawk Valley Economic Development District, Inc
- Moore Street Market Merchants Association
- National Grid
- New York Energy Democracy Alliance
- New York Power Authority
- North Country Energy Task Force
- Northeast Green Building Consulting, LLC
- Northern Manhattan Improvement Corporation
- Northwest Bronx Community & Clergy Coalition, Inc.
- NY Assembly Member Cahill's Office
- NY for Clean Power
- NY Green Bank
- NY Senator Boyle's Office
- NYC Environmental Justice Alliance (NYC-EJA)
- NYC Mayor's Office of Recovery and Resiliency
- NYC Mayor's Office of Sustainability
- NYC Retrofit Accelerator
- NYS Department of Public Service
- NYS Homes and Community Renewal
- NYS Energy Research and Development Authority
- Options for Community Living
- Orange & Rockland
- Pace Energy and Climate Center
- Pathstone Corporation
- People United for Sustainable Housing (PUSH) Buffalo
- PEACE, Inc.
- Pratt Center for Community Development
- PSEG Long Island
- Public Utility Law Project of NY
- Regional Economic Community Action Program
- Rochester People's Climate Coalition
- Sane Energy Project
- Sierra Club
- Sierra Club – Lower Hudson
- Sierra Club – Long Island
- Solar One
- Standard Insulating
- Sunset Park Redevelopment Committee, Inc.

- Supportive Services Corporation
- Sustainable Comfort, Inc.
- Sustainable Hudson Valley
- Sustainable Solutions
- Syracuse Center of Excellence in Environment and Energy Systems
- Syracuse Housing Authority
- Syracuse United Neighbors
- The Challenger Newspaper
- TNT Southside Housing Taskforce
- True Partners Consulting LLC
- Ulster County Community Action Committee, Inc.
- University Neighborhood Housing Program, Inc.
- UPROSE
- Urban Homesteading Assistance Board
- Urban Jobs Task Force
- West Harlem Environmental Action, Inc.
- Westminster Economic Development Initiative
- Western New York Environmental Alliance

Appendix B: Stakeholder Forum Discussion Questions

DISCUSSION POINTS

Staff expect a broad discussion of issues related to energy affordability and access to clean energy solutions in the LMI market segment to take place at the meeting. As part of the discussion at the forum, Staff would also like to gain insight on the following questions:

1. *LMI Portfolio*

- How should success be defined for the LMI portfolio? Deepest energy burden reductions, number of households served, increasing access to renewable technologies, other?
- How should resources be prioritized or synchronized to deliver the greatest health, comfort and affordability benefits to the greatest number of customers? (energy efficiency, renewables, bill discounts)
- NYSERDA and the utilities each have strengths as a program administrator. What can each do well, and what can each improve on? How can their respective programs work better together (cooperation rather than competition)?
- What role should financing solutions play in providing access to clean energy solutions for LMI customers? What about for affordable housing providers?
- What unique barriers do you encounter when seeking to deliver clean energy services to LMI residents (beyond those discussed already)?
- Can you identify innovative or otherwise successful approaches to increasing energy affordability and access that can be applied in New York State?

2. *LMI Market Segments*

- Energy efficiency programs in rental properties have historically faced some unique barriers such as the split incentive between owners and tenants. How can initiatives make greater progress in ensuring balanced incentives and benefits for residents and owners? Can you provide examples?
- How can initiatives be structured to improve how benefits of clean energy upgrades are realized by tenants?
- Affordable multifamily buildings present unique opportunities and challenges for incorporating clean energy solutions. What are the opportune times for influencing property owners and managers? What barriers need to be addressed and what interventions show promise? Can you identify specific initiatives that have been successful in engaging multifamily property owners?
- Are there special considerations necessary for certain groups within the LMI market segment? (e.g.: seniors or rural customers)

3. *Coordination*

- What opportunities exist to work with other State agencies or leverage other resources to drive access to clean energy and energy affordability?

4. *Community Ownership of Distributed Energy Resources (DER)*

- Can you identify replicable models for community ownership of DER, such as a community solar project?

5. *Engagement/Process*

- How can community/resident engagement be improved? What opportunities exist to leverage existing touch points with LMI residents? What aspects of LMI customer engagement are most valuable to improve? How can property owner engagement be improved?
 - General awareness
 - How to participate
 - Where to go for help
 - How to propose a project
- Identify opportunities for modifications to DPS/NYS process/procedure to improve opportunities for engagement. Identify possible improvements to utility opportunities for engagement. What attributes would a good process have, in terms of:
 - Impediments to participating
 - Providing useful information
 - Accountability for action items
 - Quality of listening?

The subject of energy affordability and access is broad and the time allocated for the forum may not be sufficient to have discussion on all of these questions. If you have input on any of these questions, please feel free email your thoughts to LMIforum@nyserda.ny.gov.