

January 12, 2024

Honorable Michelle Phillips  
Secretary  
New York State Public Service Commission  
Three Empire State Plaza, 19th Floor  
Albany, New York 12223

Re: Case 18-M-0084 – In the Matter of a Comprehensive Energy Efficiency Initiative

Dear Secretary Phillips:

Pursuant to the Department of Public Service’s (“DPS”) direction for Program Administrators to provide supplemental information (“Request for Supplemental Information”),<sup>1</sup> Consolidated Edison Company of New York, Inc. (“Con Edison” or the “Company”) provides information requested for its Non-Low- and Moderate-Income (“Non-LMI”) Energy Efficiency and Building Electrification (“EE BE”) Proposal.

The attached Excel workpapers format the Company’s projections for its Base and Expanded Portfolios according to the requirements of the Request for Supplemental Information. Additionally, as an addendum to this cover letter, the Company enumerates interdependencies between EE BE Program Administrators.

Finally, the Company makes minor corrections to its original proposal.<sup>2</sup> Together, these changes decrease total lifetime energy savings for the 2026-2030 period by 0.1 percent, and increase total budgets by 2.7 percent for both the base and expanded portfolios compared to the Company’s original filings. Specifically, the Company:

- Aligned certain underlying assumptions across commodities and slightly revised certain incentive costs for the Multifamily, Commercial & Industrial, and Small-and-Medium Business programs; and
- Updated labor costs to include “fully loaded labor costs” as outlined in the Request for Supplemental Information.<sup>3</sup>

In addition, the Company updated the text to:

- Reflect the changes caused by the update in the assumptions outlined above;
- Make formatting and cosmetic updates;
- Make clear that the Company will allocate costs from envelope projects based on the share of savings from each commodity;
- Correct the application of Footnotes 20 and 21 throughout the document;

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<sup>1</sup> NENY Proceeding, EE-BE Proposal Supplemental Information Request (filed December 14, 2023).

<sup>2</sup> NENY Proceeding, Consolidated Edison Company of New York, Inc. Non-Low-and-Moderate Income Energy Efficiency and Building Electrification Portfolio Proposal Filing (filed November 1, 2023).

<sup>3</sup> NENY Proceeding, EE-BE Proposal Supplemental Information Request (filed December 14, 2023), p. 3.

- Clarify the source of the expected customer payback assumptions used for calculations related to the Commercial and Industrial program; and
- Revise the footnote explaining labor costs to reflect the definition included in the request for supplemental information.

Please contact me if you have any questions.

Sincerely,

*/s/ Mary Krayeske*

Mary Krayeske

## **Addendum**

### Interdependencies of Con Edison's LMI EE BE Proposal with other Program Administrators

NYSERDA provides important support across the State for energy efficiency and electrification projects. Success in NYSERDA's technical assistance programs, workforce development, demonstration projects, midstream market capacity and capability development, and customer education campaigns will contribute to the success of the Company's proposals. The Company intends to continue to collaborate with NYSERDA on these efforts. Specifically, the Company will:

- Leverage the strengths of partners and stakeholders to support buildings seeking to make EE and BE investments, including NYSERDA, Clean Energy Hubs, and the New York City Accelerator;
- Support NYSERDA-led efforts to further develop customer awareness of EE and BE measures, research new offerings, develop financing options, and expand New York State's clean energy workforce;
- Coordinate on community campaigns, educate residents about programs, and respond to resident feedback on program design and accessibility;
- Coordinate on demonstration projects;
- Share information from completed projects to help NYSERDA refine its technical assistance offerings;
- Notify customers of assistance available through NYSERDA, as appropriate; and
- Work with NYSERDA to align its FlexTech technical assistance offering to better align with utility program eligibility and data requirements.

In addition, the Company will coordinate with National Grid in its overlapping territory to serve customers in streamlined ways. For example, in cases where National Grid seeks to offer larger building electrification incentives as part of a Non-Pipeline Alternative ("NPA") or gas moratorium relief effort, these incentives would act as an adder funded by the NPA on top of the baseline electric building electrification incentives offered by the Company. This approach avoids offering competing options to the same customer base to limit customer confusion and optimize use of customer investment.