



January 12, 2024

Hon. Michelle Phillips, Secretary  
New York State Public Service Commission  
Three Empire State Plaza, 14th Floor  
Albany, New York 12223-1350

Re: Case 18-M-0084 - In the Matter of a Comprehensive Energy Efficiency Initiative;  
Order Directing Energy Efficiency and Building Electrification Proposals

Dear Secretary Phillips:

Pursuant to the New York State Public Service Commission's ("Commission") Order Directing Energy Efficiency and Building Electrification Proposals, issued and effective July 20, 2023 in Case 18-M-0084, please find Central Hudson Gas & Electric's ("Central Hudson" or the "Company") Energy Efficiency and Building Electrification Portfolio Supplemental Information for years 2026-2030. Central Hudson submits in response to Staff's request for supplemental information letter filed on December 13, 2023. Additionally, as an addendum to this cover letter, the Company enumerates interdependencies between EE BE Program Administrators to the extent possible.

The Company submits the Excel workpaper:

- Central Hudson - EE-BE Supplemental Information Request Non-LMI Portfolio

Questions related to this filing should be directed to Cory Scofield at (845) 275-4214 or [cscfield@cenhud.com](mailto:cscfield@cenhud.com).

Respectfully submitted,

*/s/Cory Scofield*

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#### Addendum Addressing Interdependencies between EE BE Program Administrators:

The Company proposes that utilities establish agreements, similar to other Memorandums of Understanding (MOU) in place for other projects existing in overlapping utility service territories such as the Overlapping Service Territory Agreement developed within the Multifamily Statewide Low- and Moderate-Income (LMI) Upstate New York (NY), (“Upstate AMEEP MOU”). The primary aim of these agreements is to create a consistent framework for providing multifamily building owners and developers with access to uniform financial incentives for energy efficiency upgrades. Such coordination ensures that regardless of the utility serving an overlapping service territory, customers can expect a standardized approach for implementing energy-saving projects.

When a project involves both electric and gas measures, the electric service provider's implementation contractor should take the lead, and all projects within the overlapping territory should adhere to this principle. General guidelines should include:

- Application approval involves sharing gas measures with respective implementation contractor or utility.
- Streamlined data processes are adopted to meet all utilities' reporting needs.
- Payments and invoicing are managed individually, but overlapping service territories follow the agreed pricing structure.
- Savings align with the utility providing funding; electric savings go to the electric utility, gas savings to the gas utility.
- Measures resulting in both heating and cooling savings are divided among respective utilities.
- Liabilities follow the terms of the electric utility's agreement.
- Customer, energy savings, and project cost data are shared among the involved utilities.

MOUs promoting cooperation and streamlined processes in shared service territories should be used where applicable to make the project seamless for the customer. The Company has limited overlapping service territory with other Program Administrators but will coordinate as required to ensure a streamlined application process and an intuitive customer experience.

#### Additional Integration with NYSERDA:

Central Hudson continues to seek opportunities for collaboration with NYSERDA. The Company anticipates that as market rate programs evolve and continue to be offered from NYSERDA, such as Comfort Home, there will be opportunities to combine utility and NYSERDA incentives for customers in Central Hudson’s service territory. Central Hudson and NYSERDA will coordinate to design incentives and program structures that complement each other and provide the maximum benefit to the customer.

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 programs. 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.
- 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.
- Work with NYSERDA to align its FlexTech technical assistance offering to better align with utility program eligibility and data requirements.
- Share information from completed projects to help NYSERDA refine its technical assistance offerings.
- Notify customers of assistance available through NYSERDA, as appropriate.