Consolidated Edison Company of New York, Inc.

KeySpan Gas East Corporation d/b/a National Grid

The Brooklyn Union Gas Company d/b/a National Grid NY

Updated Non-LMI Regional Weatherization Program for Residential and Multifamily Customers Implementation Plan



nationalgrid

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Case 25-M-0248

I. Introduction, Summary of Proposal, and Key Context

1. Introduction

The Downstate Utilities of New York[1] submit this update to the Regional Weatherization Program for Residential and Multifamily Customers ("Regional Weatherization Program") Implementation Plan ("Implementation Plan" or "Plan") as instructed by the Director's Letter regarding the Non-LMI energy efficiency and building electrification ("EE/BE") portfolios.[2] The Downstate Utilities filed the initial Regional Weatherization Implementation Plan on August 15 in accordance with the New York State Public Service Commission's ("Commission") May 15, 2025 Order Authorizing Non-Low- to Moderate-Income Energy Efficiency and Building Electrification Portfolios for 2026-2030 ("Non-LMI EE/BE Order").[3]

On September 15, 2022, the Commission issued the Order Initiating the New Efficiency: New York Interim Review and Clean Energy Fund Review ("NE:NY Order"),[4] which ordered Department of Public Service ("DPS") Staff to conduct a review of a portfolio of ratepayer-funded clean energy programs. Pursuant to the NE:NY Order, on December 20, 2022, DPS Staff filed its Energy Efficiency and Building Electrification Report ("EE/BE Report")[5] which assessed the performance of the New York State's Investor-Owned Utilities' ("Utilities") and New York State Energy Research and Development Authority's ("NYSERDA") ("Program Administrators") EE/BE portfolios and outlined recommendations for future portfolios. Collectively, the Utilities and NYSERDA are referred to as "Program Administrators." On July 20, 2023, the Commission issued its Order Directing Energy Efficiency and Building Electrification Proposals,[6] which provided guidance and established budget limits for the applicable Program Administrators' EE/BE proposals. In that Order, the Commission set forth parameters to improve program delivery and coordination amongst Program Administrators, increase the benefits delivered to LMI customers and Disadvantaged Customers ("DACs"), and drive the transition of portfolios to help meet current market needs and New York State policy objectives. Pursuant to the Order, the

[1] The Downstate Utilities are Consolidated Edison Company of New York, Inc. ("Con Edison"), KeySpan Gas East Corporation d/b/a National Grid ("KEDLI"), and The Brooklyn Union Gas Company d/b/a National Grid NY ("KEDNY").
[2] Case 25-M-0248, *In the Matter of the 2026-2030 Non-Low- to Moderate-Income Energy Efficiency and Building Electrification Portfolios (EE/BE Proceeding)*, Preliminary Non-LMI EEBE IP Compliance Letter at 4 (dated November 21, 2025).
[3] Case 14-M-0094 et al., *Proceeding on Motion of the Commission to Consider a Clean Energy Fund,* Order Authorizing Non-Low-to-Moderate-Income Energy Efficiency and Building Electrification Portfolios for 2026-2030 (May 15, 2025) (Non-LMI EE/BE Order).
[4] Case 14-M-0094 et al., *Proceeding on Motion of the Commission to Consider a Clean Energy Fund*, Order Initiating the New Efficiency: New York Interim Review and Clean Energy Fund Review (September 15, 2022) (NE:NY Order).
[5] Case 14-M-0094 et al., *Proceeding on Motion of the Commission to Consider a Clean Energy Fund,* Department of Public Service Staff Energy Efficiency and Building Electrification Report (December 19, 2022) (EE/BE Report).
[6] Case 14-M-0094 et al., *Proceeding on Motion of the Commission to Consider a Clean Energy Fund*, Order Directing Energy Efficiency and Building Electrification Proposals (July 20, 2023).

Program Administrators filed proposals for their EE/BE portfolios for 2026 – 2030 in November of 2023 and filed supplemental information in January 2024.

The Non-LMI EE/BE Order approved, with modifications, the proposals by the Program Administrators and authorized budgets for the Non-LMI EE/BE portfolios for the 2026-2030 period and directed the Upstate Utilities[7] and Downstate Utilities to file separate, regional weatherization plans to serve small residential homes and, for the Downstate Utilities, multifamily buildings, for non-LMI customers. The Upstate and Downstate Utilities have developed the Upstate and Downstate Regional Weatherization Implementation Plans in coordination with one another and consistent with the direction of the Non-LMI EE/BE Order. As is described in this Plan, the Downstate Utilities seek Commission approval to implement the Downstate Regional Weatherization Program by January 1, 2027.

The Downstate Utilities are committed to advancing energy efficiency and look forward to continuing to deliver programs that support New York State's climate and decarbonization goals codified in the Climate Leadership and Community Protection Act ("CLCPA").

2. Summary of Proposal

In this filing, the Downstate Utilities outline a framework to create jointly administered weatherization offerings that will serve customers in Con Edison, KEDNY, and KEDLI's service territories. This close collaboration will allow the Downstate Utilities to offer residential and multifamily customers in the region a single set of weatherization incentives that will be available regardless of their utility, reducing market confusion. Moreover, it will allow the Downstate Utilities to jointly procure contractors and limit administrative costs. To reflect this close coordination, the Downstate Utilities propose a single regional budget and savings target for Con Edison and KEDNY's service territories rather than different budgets and targets for each Company. KEDLI will manage a program that mirrors the design of Con Edison and KEDNY's joint offering with its own separate budget and target. National Grid intends to hire the same program implementation vendor ("Implementation Vendor") as Con Edison and KEDNY to administer the program in KEDLI.

This level of collaboration between the Downstate Utilities is needed to meet the ambitious level of weatherization called for in the Non-LMI EE/BE Order.[8] In 2025, the Downstate Utilities forecast providing $17.7 million in program spend for residential and multifamily weatherization measures, which will need to increase to an average of more than

[7] The Upstate Utilities of New York are Central Hudson Gas & Electric Corporation, National Fuel Gas Distribution Corporation, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.
[8] Non-LMI EE/BE Order at 28.

$119 million per year assuming a program that launches on January 1, 2027 and ends in 2030. The Downstate Utilities note that the Non-LMI EE/BE Order authorized five years of budgets and targets for 2026-2030, though provides an expected launch date of January 1, 2027, for the Regional Weatherization programs, contingent on the Commission's approval of the Implementation Plans.

Success of the Downstate Regional Weatherization Program is critical to meet the Non-LMI EE/BE Order's minimum program budget allocation requirements for weatherization of at least 50 percent of the gas portfolio and 25 percent of the electric portfolio.[9] In addition, if the Downstate Utilities fall short of the spending outlined in this plan, Con Edison may exceed the spending limit of 50 percent of the electric budget for electrification.[10] Given the interconnected nature of these budget requirements, a strict annual approach to compliance could necessitate potentially shrinking portions of the Downstate Utilities' EE/BE portfolios to follow these rules to meet the various allocation requirements. The Downstate Utilities believe this possibility is counter to the larger objectives of the Non-LMI EE/BE Order and the State's clean energy policy objectives. Therefore, the Downstate Utilities request that these budget requirements be targets to achieve by 2030 rather than enforced annually.

The Downstate Utilities have assembled a Regional Weatherization portfolio that achieves the Non-LMI EE/BE Order's minimum cumulative budget requirements for residential and multifamily weatherization. However, the Downstate Utilities will need to overcome challenges to achieve the targets in this Implementation Plan. Weatherization projects can be costly because they must adapt to the existing conditions in each building and, depending on the type of measure installed, may cause disruption to the building's inhabitants. It will be necessary to undertake significant customer education efforts to explain the benefits of weatherization, make program design improvements to drive effectiveness and limit administrative costs, and increase incentives to make these projects more attractive.

While increasing customer interest for these measures, the Downstate Utilities will also need to build a contractor network that has the capacity to meet this new demand. The Downstate Utilities will need to work with contractors who currently participate in their programs as well as enroll new ones.

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[9] Footnote 19 on page 25 of the Non-LMI EE/BE Order defines "program" budget as "the budget available for programs not including labor, EM&V, and non-labor administration." Based on this definition, the Downstate Utilities interpret the minimum "program" budgets in Appendix C of the Non-LMI EE/BE Order to only include incentive, implementation, and marketing costs. Therefore, all references to "program" budgets in this Implementation Plan include only incentive, implementation, and marketing costs unless otherwise specified.

[10] Non-LMI EE/BE Order at 25.

This Implementation Plan describes the strategy that the Downstate Utilities believe is most likely to succeed in achieving the Commission's goals for increased weatherization in the Downstate region.

The document is structured into the following sections:

- **Section II Regional Weatherization Program Elements** provides the specific program offerings and the incentive structure for optimizing customer participation.
- **Section III Program Administration/Infrastructure** describes the administrative structure of the program. This includes the funding and savings approach between the Downstate Utilities, the process for customer identification, Implementation Vendor responsibilities, the Participating Contractors' network, program marketing, and long-term capital planning.
- **Section IV** summarizes the **Weatherization Budgets and Energy Savings Targets**.
- **Section V** outlines the **Program Filing and Reporting Schedules**.
- The **Appendix** provides proposed 2026-2030 budget and savings targets for each utility's Regional Weatherization sub-portfolio.

II. Regional Weatherization Program Elements

1. Specific Program Offerings

a. *Residential (1-4 Family Homes)*

The offerings for residential weatherization will build upon lessons learned from Con Edison's Weather Ready program, National Grid's Total Home Comfort program,[11] and NYSERDA's Comfort Home program. While these programs have seen some success, the level of current activity falls short of what is required to meet the weatherization activity called for in the Non-LMI EE/BE Order.[12] In order to achieve the minimum budget requirements, the Downstate Utilities anticipate the need to complete more than six times the projects in 2030 compared to the forecasted savings that will be completed through Weather Ready in 2025. Figure 1 shows the increase in residential savings envisioned in this Implementation Plan. Weatherization is often an expensive endeavor for homeowners, especially when compared to the savings achieved.

Con Edison's Weather Ready program has seen typical project costs of approximately $10,000 to $12,000. As the Non-LMI EE/BE Order stated, "[t]he Commission recognizes that

[11] National Grid's "Total Home Comfort" residential weatherization program was active in KEDLI and KEDNY from September 2021 to August 2023. The program was closed due to customer and contractor demand exceeding allocated budgets. National Grid paused its plan to relaunch its residential weatherization offerings in Q1 2025 to ensure alignment with the Non-LMI EE/BE Order.
[12] Non-LMI EE/BE Order at Appendix C.

building weatherization at scale may be more expensive on a saved energy unit cost basis than other measures."[13] Even customers in Westchester County that could combine a $2,000 Weather Ready incentive with Comfort Home incentives faced 11-year payback periods based on an average project cost of $10,800 and incentives covering 46% of the project cost. NYSERDA estimates that reasonable payback period for residential customers is six years.[14] Furthermore, incentives must be high enough to achieve these payback period targets in the absence of Comfort Home incentives.

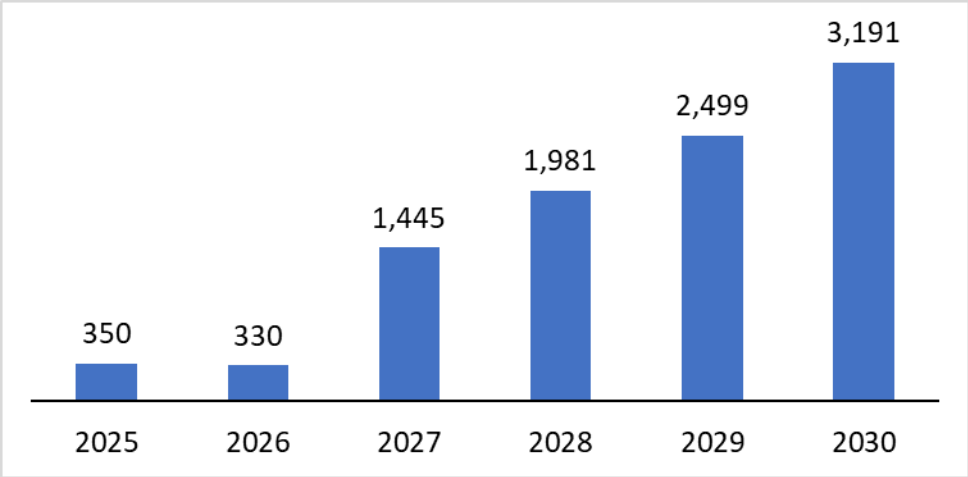


Figure 1: Residential Weatherization Savings 2025-2030 (LMMBtu in 000s)

Beyond incentives, there are other challenges to scaling the Downstate Regional Weatherization Program. There is often no single event that may force a customer to consider a weatherization project, such as a boiler or an air conditioner coming to the end of its useful life. In addition, Weather Ready has not seen significant uptake in the 1-4 family market in New York City. Contractors report that the additional costs and challenges caused by working in a dense urban environment, such as commute time and a lack of parking, lead them to focus on other jurisdictions that are more profitable. Additionally, unlike in Westchester, customers in New York City were unable to stack incentives with Comfort Home which also contributed to lower uptake.

As described below, the Downstate Utilities propose to complete more than 24,000 residential projects in their service territories by the end of the five-year period, with nearly 8,300 projects completed in 2030. To put this number into perspective, from 2021 to the end of 2024 NYSERDA's Comfort Home program completed 7,036 projects across the State with more than 2,700 projects completed in 2024. In addition, Comfort Home has reached

[13] *Id*. at 35.
[14] NYSERDA, Assessment of Energy Efficiency and Electrification Potential in New York State Residential and Commercial Buildings (2023(, Appendix A, p 11

56% of planned savings in 2024. NYSERDA wrote that "[e]nergy savings are lagging due to…a higher-than-expected cost to deliver Comfort Home projects due to inflation."[15] The high cost of weatherization projects is further reflected in NYSERDA proposing to increase its cost per LMMBTu-e saved by 36% in 2026.[16] Likewise, Comfort Home has seen limited participation in New York City when it offered incentives that are similar to Weather Ready.

Given these market dynamics, the Downstate Utilities believe that a significant transformation in the weatherization ecosystem is needed to meet the step change in activity envisioned in the Non-LMI EE/BE Order. Higher incentives than current program offerings that can cover a greater percentage of the project cost will be needed to spur homeowners to consider weatherization measures. This will further improve project economics for customers. Moreover, a simple incentive approach is needed along with low barriers to entry that allow customers the flexibility they need to do the projects that are best aligned with their circumstances while sending clear price signals to encourage customers to embark on more comprehensive projects. In addition to improving the economics of a project to grow the program, the Downstate Utilities, with support from NYSERDA, will need to increase awareness of the offerings and the benefits of weatherization through marketing and customer education. Customers may be unfamiliar with weatherization, as it is not something they see or feel every day as with lights, an air-conditioner, or a boiler. Moreover, it will be necessary to explain not only how it can improve comfort but also how it can reduce energy usage.

Finally, the contractor base will need to grow to meet the expected demand. This means helping current Participating Contractors in Comfort Home transition to the new Regional Program, supporting existing Weather Ready and multifamily Participating Contractors to expand their capacity, and enrolling new contractors. Training for these new contractors will be important to help them provide excellent service to customers. The Downstate Utilities will seek to work with NYSERDA on these topics. Program administration must also keep pace with this growth, processing applications in a timely manner, conducting inspections, and working with Participating Contractors to maintain documentation accuracy, installation quality and safety. The Downstate Utilities also strongly encourage NYSERDA to provide large-scale workforce development initiatives during 2026-2030 to train a significant number of contractors in Downstate New York to perform residential weatherization installations. No-cost or subsidized training programs that are funded and administered by NYSERDA such as Building Performance Institute

[15] NYSERDA, 2024 CEF Annual Performance Report, p. 164.
[16] EE/BE Proceeding, NYSERDA Non-Low-To-Moderate Income Energy Efficiency and Building Electrification Portfolio Implementation Plan Tables and Companion Data (filed October 31, 2025).

("BPI") certification courses would support the contractor network expansion necessary to reach the Commission's goals for the Downstate Regional Weatherization Program.

Table 1 shows the currently anticipated weatherization measure tiers for residential customers in 1–4-unit buildings. These are illustrative based on current planning and may change over time. Program Administrator flexibility in setting incentives, both in terms of structure and level, is critical to respond to regional market changes as well as lessons learned from launching this new program. Actual incentive amounts will be published in relevant Program Manuals following Commission action on this filing.[17]

Table 1: Illustrative Tiered Weatherization Measures for the Residential Customers

Tier	Included Measures
Tier 1: Good	Whole-home air sealing, attic/ceiling insulation, and rim joist insulation
Tier 2: Better	All measures from Tier 1 and exterior wall insulation plus any other insulation measure[18]

The Downstate Utilities will require flexibility to adapt to the response from the market. To meet the savings targets included in this plan, the program will need to explore different incentive levels, offerings, and program rules to determine what works and what does not. The design of the program in 2030 may need to be different than what is contemplated in this Implementation Plan due to changing economics, new technologies, customer adoption patterns, and other factors over time. Similarly, what works upstate may not be the same as what is required downstate. The Program will coordinate any changes with EmPower+ so that incentive levels do not exceed those available to LMI customers.

b. Multifamily (buildings with 5 or more residential units)

The Downstate Utilities seek to build on the growth trajectory of Con Edison's and National Grid's multifamily weatherization offerings. This success in Con Edison's program has been driven by attic insulation, in which insulation is typically blown into the cavity between the ceiling of the top floor and the roof deck. National Grid's multifamily weatherization program will shift from a focus on measures with a high participation rate such as air-conditioner covers to offerings with more comprehensive building shell improvements that require greater intervention. Despite this rapid growth, the Downstate Utilities will still need to nearly septuple multifamily weatherization savings from 2025 to

[17] The Downstate Utilities currently anticipate a Regional Weatherization program manual for Residential (1–4-unit buildings) and that information on multifamily weatherization offerings be included with all other multifamily incentives in one Multifamily Program Manual.
[18] Other measures could include but may not be limited to floor over basement insulation, knee-wall insulation, ceiling and overhang insulation, crawl space wall and/or ceiling insulation, and garage ceiling insulation.

2030 to meet the targets in this Implementation Plan. Figure 2 shows the increase in multifamily weatherization savings envisioned in this Implementation Plan.

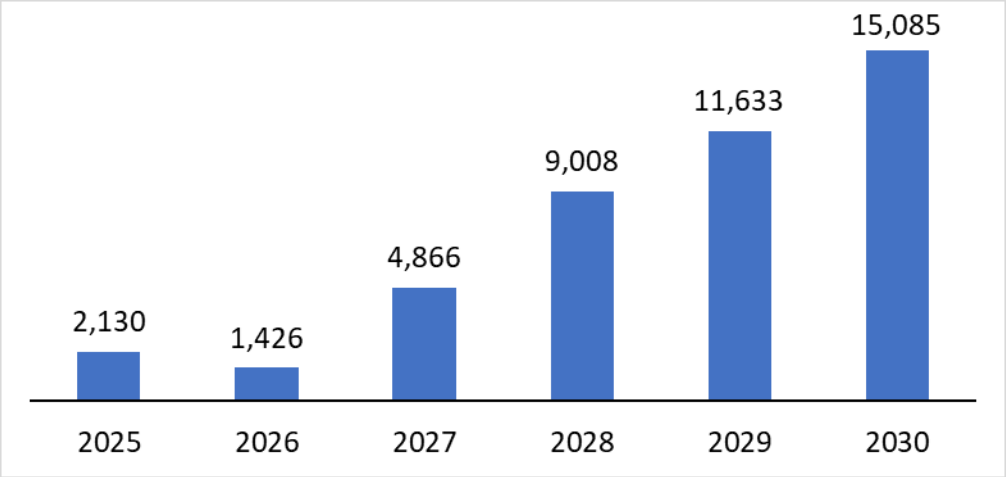


Figure 2: Planned Multifamily Weatherization Savings 2025-2030 (LMMBtu in 000s)

Con Edison and National Grid's weatherization incentives have been offered on an "à la carte" basis, where customers can choose which measure (or measures) work best for them. The Downstate Utilities intend to continue this strategy. The diversity of the building stock in the downstate service territories will make it challenging to design tiered measure packages that are effective for all the multifamily building typologies found in New York City, Westchester, and Long Island. However, to encourage customers to undertake multiple measures, the Downstate Utilities will consider implementing an "adder" incentive if the customer performs more than one weatherization offering.

The Downstate Utilities currently intend to focus primarily on three measures — attic insulation, wall insulation, and window replacements. Attic and wall insulation tend to have shorter payback periods for customers and lower upfront costs. Attic insulation can be installed without causing disruption for existing tenants, while new methods of wall insulation installation can be done more quickly and less intrusively than previous approaches with one visit to an apartment and less disruption to tenants. By contrast, while window replacements represent a large opportunity for building weatherization improvements, buildings owners may be hesitant to undertake the projects due to tenant disruption and poor project economics. Building owners consider the impact on building operations and tenant quality of life when deciding whether to weatherize their properties. As the Downstate Regional Weatherization Program evolves, the Downstate Utilities may identify other measures that show high growth potential.

The Downstate Utilities will try to design incentives for these three measures that provide upfront clarity to contractors and customers about the amount of funding available

for their projects based on readily available information (e.g., square feet insulated) while balancing the uncertainty in savings generated by a particular project in order to determine the appropriate incentive structure. Final incentive amounts, and incentive structure when the program launches, will be stated in the Downstate Weatherization Program Manual. In addition, customers that wish to undertake different weatherization measures (e.g., recladding) will still be eligible to participate through a custom process. All eligible measures will be listed in the program manuals for each of the Downstate Utilities' respective multifamily programs.

The Downstate Utilities will also consider providing additional incentives for projects that pair one of these insulation measures with air sealing. To date, the savings and incentive available for air sealing coupled with the need to enter tenant spaces to complete interior work have not generally moved multifamily contractors and customers to pursue it. However, the Downstate Utilities believe that the project economics will be more attractive if paired with another measure.

The Regional Weatherization offerings for multifamily customers will be offered through the Downstate Utilities' broader multifamily programs. This will allow the Downstate Utilities to market a suite of offerings more easily to this building sector rather than treat weatherization offerings as distinct from other relevant measures. For example, Con Edison will be able to highlight the availability of incentives for electrification and weatherization under one program name, reinforcing that there are benefits to performing both upgrades together. Marketing a weatherization offering as a distinct program could lead to market confusion as well as concern from participants about duplicative applications and program requirements.

c. Integration with Clean Heat and Building Electrification Offerings

The Regional Weatherization Program will offer incentives to non-LMI customers who hold accounts with the participating utilities and pay the Systems Benefit Charge. These incentives will support weatherization and building envelope improvements for 1- to 4-unit homes and multifamily buildings served by the Downstate Utilities. Building on the legacy of NYS Clean Heat, Con Edison's multifamily program currently offers incentives for building electrification projects that concurrently include weatherization. Con Edison will harmonize these offerings that include weatherization and building electrification to make it more accessible and attractive to building owners following the approval of the Regional Weatherization Program.

d. Other Programs

In its November 21, 2025 letter conditionally approving the Program Administrators' Non-LMI EE/BE Implementation Plans, DPS did not approve the Retail Products offering proposed by the Downstate Utilities as part of the Regional Weatherization Program. This offering was intended to incentivize weatherization products at participating retailers (e.g., hardware stores) for non-commercial customers, such as air-sealing caulk, spray foam insulation, batt insulation, and individual windows. By removing the Retail Products offering from the Non-LMI EE/BE portfolio overall, DPS Staff determined that it will also not be included in the Regional Weatherization Program. Accordingly, the Downstate Utilities have removed Retail Products measures from this revised Implementation Plan. The exclusion of Retail Products reduces the overall savings potential of the program, since these measures would have contributed incremental energy savings and broadened customer participation.

The Downstate Utilities seek the flexibility to explore in consultation with Staff other program models that align with the Commission's goals for the Regional Weatherization framework.

2. Role and Level of Energy Audit or Assessment

d. Residential

Initially, consistent with current practice in Con Edison's Weather Ready program, the Regional Weatherization Program will require all residential buildings to perform a blower door test before and after measure installation to demonstrate savings from the project. This requirement may change as the Downstate Utilities gather more feedback from the market.

e. Multifamily

Also, in line with current practices, the Regional Weatherization Program will not require that multifamily buildings perform specific energy assessments to receive incentives for weatherization measures. In practice, multifamily buildings engage with contractors and other building professionals before undertaking a project. Based on program experience, the Downstate Utilities believe that giving service providers and building owners the flexibility to determine what study and pre-project support they need before commencing a project will better serve the market.

For example, at its launch, the statewide Affordable Multifamily Energy Efficiency Program ("AMEEP") required participants in the program's Comprehensive pathway to first complete an energy audit, either through NYSERDA's FlexTech program or as part of receiving funding from an affordable housing agency. After running and testing the program in market for two years, the Program Administrators (including NYSERDA) determined that requiring the completion of an energy audit as a condition of Comprehensive pathway eligibility represented a barrier to participation by adding time and cost to projects without benefiting

customers. As such, the Program Administrators removed the requirement in favor of a more expedited project life cycle and basing of work scopes on documentation of existing building conditions as required by the program and conducted by the Implementation Vendor.

Further, as instructed by the Non-LMI EE/BE Order, the Downstate Utilities and NYSERDA, along with other Program Administrators in the state, are working to improve the collaboration for a revised model for NYSERDA-sponsored Technical Assistance including energy assessments. The Program Administrators are working to update Technical Assistance offerings such that they help buildings participate by including the necessary information about building conditions required by multifamily program offerings. The Regional Weatherization Program does not plan to make participation in NYSERDA-sponsored Technical Assistance a prerequisite for eligibility to participating in the Program.

3. Customer Journey

This section provides an overview of the customer journey when participating in the Regional Weatherization Program, from initial sign-up through post-installation engagement. The process will be carried out in coordination with an Implementation Vendor, who will support both customers and contractors throughout the process. A detailed outline of the customer experience, including specific steps and responsibilities, will be found in the relevant program manual.

a. *Residential Customer Journey*

i. Sign-Up and Enrollment

Today, the customer's journey begins through outreach efforts, targeted marketing, or referrals—often from trusted contractors or satisfied participants. Once interested, the customer connects directly with a Participating Contractor to explore the program. During their initial conversation, the contractor works with the customer to obtain information such as name, address, utility account number, and utility provider. This allows the contractor to determine the customer's eligibility and serves as the first step in guiding them toward energy efficiency improvements through the program.

ii. Assessment and Audit

Once enrolled, the Participating Contractor will conduct an energy assessment to evaluate the home's current insulation, building performance and envelope. The Participating Contractor will conduct a blower door test to establish a baseline measurement of the building envelope's air tightness, which will be incorporated into the project's scope of work and total cost. The Participating Contractor will then have the option

to submit an application to the Program for approval before proceeding with the project or can proceed and submit the application once the project is complete. Applications would not be submitted to a specific utility. The single Implementation Vendor for Con Edison, KEDNY, and KEDLI would receive and process all applications.

iii. Access to Financing

The availability of low-to-no cost financing for weatherization projects can increase participation in the program by allowing customers to spread costs not covered by the incentive into smaller monthly payments rather than a larger lump sum due at the completion of the project. Per the November 2025 Director's Letter, the Downstate Utilities will coordinate with NYSERDA to determine if the program can leverage the financing options provided through its Green Jobs – Green New York Program. Should that not be feasible, the Regional Weatherization Program would explore partnerships with third-party financing companies who may be able to provide loans and subsidize the interest costs, in consultation with Staff. The utilities currently offer similar financing incentives to non-residential customers.

iv. Installation and Incentives

Once the customer selects their preferred offerings and agrees to the cost of the project with the Contractor, the installation phase begins. The incentive will be offered as an instant rebate meaning that the Participating Contractor reduces the invoice to the customer by the incentive amount and then receives the incentive once the project is completed, and any required post-installation inspections are finished. After installation, the Participating Contractor will perform a second blower door test to compare with the initial pre-install test. Contractors will then submit proof to the Implementation Vendor that the project was completed. Some share of projects will be subject to post-installation inspection by the Regional Weatherization Program.

v. Post-Installation Engagement

The program may continue to engage participants through follow-up surveys, satisfaction checks, and performance monitoring where applicable. Customers may also receive educational resources to help them maximize the benefits of their upgrades. Additionally, they may be invited to participate in additional programs, such as Clean Heat or refer friends and neighbors to the Regional Weatherization Program, further expanding the program's impact.

b. Multifamily Customer Journey

As discussed above, multifamily weatherization will be offered through the Downstate Utilities' multifamily programs. The journey for multifamily customers will vary depending on their needs and the project they are undertaking. Some customers may work directly with a contractor to create a scope of work and move forward with a project involving a single measure. Other customers, especially those who wish to explore multi-measure projects, may first reach out to the Downstate Utilities to understand what incentives are available and then work with a Participating Contractor or design professionals to apply for incentives. NYSERDA's technical assistance programs may also lead customers to participate. In some instances, the Downstate Utilities may provide a single point of contact to owners of multiple multifamily buildings who plan to undertake several projects across their portfolio.

Once a customer decides to undertake a project, they or their representative will submit an application to begin the review process. The Downstate Utilities may undertake a pre-inspection to confirm the baseline conditions. Once the project is complete, a post-installation inspection may take place to confirm the measure package was installed. The Downstate Utilities will then send the incentive payment to the customer or contractor.

4. Evaluation, Measurement and Verification

As required, the Program Administrators of the Upstate and Downstate Regional Weatherization Program will coordinate evaluations of these programs in consultation with DPS Staff. The Program Administrators will procure third-party evaluation contractors to perform gross savings analyses of the Regional Weatherization offerings and provide verified gross savings realization rates, consistent with CE-05 Evaluation, Measurement & Verification Guidance[19] and CE-08 Gross Savings Verification Guidance.[20] Based on the guidance of independent evaluators, the evaluations will include measurement and verification activities, such as site visits, desk reviews, and billing analysis, which could support future revisions to the NY Technical Resource Manual. Evaluations could also include process evaluation, an attribution study, and market assessment components to identify program improvement opportunities.

The Program Administrators will begin the process to engage independent, third-party evaluators once the programs acquire enough projects to allow for a statistically significant evaluation which is estimated to require a year of program activity. A further year of data collection may be needed to collect pre- and post-installation data if required by the

[19] CE-05: Evaluation, Measurement & Verification Guidance (issued November 1, 2016).
[20] CE-08: Gross Savings Verification Guidance (issued August 23, 2019).

evaluator. Therefore, the Program Administrators expect final evaluations to be complete by the end of 2029 assuming a January 1, 2027 program start date.

III. Program Administration/Infrastructure

1. Administrative Structure

a. *Residential and Multifamily*

A coordinated administrative framework has been established among the Downstate Utilities – Con Ed, KEDNY, and KEDLI – to enable effective collaboration in designing, implementing, and maintaining the Downstate Regional Weatherization Program. Con Edison and KEDNY will jointly manage the offerings available to customers in Westchester County and New York City. KEDLI will separately manage a program for customers in its gas service territory on Long Island with similar offerings. If Public Service Enterprise Group – Long Island ("PSEG-LI") agrees to participate for their electric service territory on Long Island, PSEG-LI would also be part of the administrative framework and process for the Downstate Regional Weatherization Program. The Downstate Utilities worked closely in developing this Implementation Plan to ensure consistency with the directives of the Commission's Non-LMI EE/BE Order. This coordination is reflected throughout the plan, particularly in the design of a shared administrative structure and services model tailored to the region's unique building stock. The plan also outlines a unified approach to program delivery, customer engagement, and contractor coordination. These efforts support the Non-LMI EE/BE Order's goals of reducing redundancy, maximizing value to customers, and promoting consistency across service territories while allowing for regional customization.

2. Funding and Savings Allocation Approach Between Utilities

a. *Residential and Multifamily*

The Downstate Utilities propose a single, combined annual budget and target for Con Edison and KEDNY that would address all activity in New York City and Westchester County. The single budget will be the sum of the minimum budgets in Appendix C of the Non-LMI EE/BE Order for Con Edison Electric, Con Edison Gas, and KEDNY. In total, this would average $104 million per year from 2026 to 2030. Incentives paid from this budget would be funded by both Con Edison and KEDNY to all Con Edison electric customers who participate whether they be a Con Edison gas, KEDNY gas, or delivered fuel customer. The proportional contribution to the incentive, implementation, and marketing costs by the Downstate

Utilities would be the same for each project and based on the amount each contributed to the overall budget. Table 2 provides illustrative examples.

Table 2: Combined Budget and Incentive Payment Examples

	Annual Ordered Budget Contribution[21]	**Incentive Contribution for Residential Project with Oil Heating System in Westchester**	**Incentive Contribution for Multifamily Con Ed Gas Customer Building in the Bronx**
Total	$104 million	$5,000	$48,000
Con Edison Electric	*$61 million (59%)*	*$2,950 (59%)*	*$28,320 (59%)*
Con Edison Gas	*$28 million (27%)*	*$1,350 (27%)*	*$12,960 (27%)*
KEDNY	*$15 million (14%)*	*$700 (14%)*	*$6,720 (14%)*

The budget would be spent to meet one, fuel-neutral LMMBtu-e target. Savings achieved through weatherization offerings would contribute to the individual Downstate Utilities' overall portfolio targets outlined in Appendix D of the Non-LMI EE/BE Order. These savings would be allocated to each Downstate Utility based on the proportion of funds contributed to the annual budget. This ratio would be consistent for all projects. An illustrative example is provided in Table 3. KEDLI will have separate budgets and targets as shown in the KEDLI Gas Service Territory Budgets and Targets section below.

The Downstate Utilities believe a combined budget and target is critical to aligning objectives across each individual utility to effectively administer one joint, regional program. The Downstate Utilities note that AMEEP will also continue to be jointly administered. However, AMEEP will have separate budgets and targets for each utility, adding complexity to program administration and reporting, as well as potentially positioning the Downstate Utilities to diverge in program objectives depending on market activity. To address these challenges, the Downstate Utilities propose to work with DPS Staff to evaluate and potentially implement a combined budget and target framework for AMEEP modeled off the proposal for the Regional Weatherization Program.

[21] The Downstate Utilities intend to keep current weatherization offerings available to customers until the Residential Weatherization Program launches utilizing the current savings framework. The Companies will deduct the budget expended and savings achieved during that time from the Residential Weatherization Program budgets and targets. Therefore, the proportion of budget contribution and savings allocation may change from what is shown here.

Table 3: Illustrative Savings Allocations

	Annual Ordered Budget Contribution[22]	Residential Project Savings Allocation	Multifamily Project Savings Allocation
Total	$104 million	400 LMMBtu-e	6,500 LMMBtu-e
Con Edison Electric	*$61 million (59%)*	*236 LMMBtu-e (59%)*	*3,835 LMMBtu-e (59%)*
Con Edison Gas	*$28 million (27%)*	*108 LMMbtu-e (27%)*	*1,755 LMMBtu-e (27%)*
KEDNY	*$15 million (14%)*	*56 LMMbtu-e (14%)*	*910 LMMBtu-e (14%)*

3. Process for Customer Identification/Referrals

Con Edison and National Grid will establish a coordinated implementation approach for the Downstate Regional Weatherization Program that accounts for overlapping service territories. Customers will apply through a single, standardized application form, which will be processed by a shared Implementation Vendor.

In areas with split service—where one utility provides gas and the other electric—this method ensures proper allocation of program benefits and funding. By tracking the percentage of customers from each utility, the program can assess participation levels by territory and adjust strategies to boost engagement where needed.

Both utilities will adopt unified program requirements and processes through the shared Implementation Vendor, ensuring that contractors and customers have consistent experiences regardless of service territory. To further streamline the process, Con Edison and National Grid are aligning data requirements for a single application, supporting a unified program structure and enhancing operational efficiency across the region.

Con Edison and National Grid are committed to administering a joint program that drives administrative efficiencies and offers customers and contractors a consistent offering and process across territories. To enable this, Con Edison and KEDNY have proposed a combined budget and target to align their goals and allow them to jointly run a single program across New York City and Westchester County, where customers all receive the same offerings regardless of their gas utility.

[22] Id.

The Downstate Utilities appreciate that each utility's customers need to receive benefits reasonably commensurate with their contributed funding. To balance the administrative and equity aspects, the Downstate Utilities propose including a goal to drive at least 14% of projects within KEDNY's territory. This will be tracked and actively managed through day-to-day operations. The Downstate Utilities will report projects by service territory in its Annual Reports. If the data shows regional imbalances, the Downstate Utilities will identify ways to correct them.

The Downstate Utilities view this target as a minimum. Because all Con Edison gas customers are electric customers and because weatherization measures can last 20 to 30 years, the relative contribution of savings from projects installed now in KEDNY's territory will benefit electric customers over time as buildings electrify heating. Therefore, both Con Edison and KEDNY seek to increase weatherization activity in KEDNY's service territory.

As an alternative, the Downstate Utilities may seek to drive equitable distribution of incentive dollars as opposed to project count. The Downstate Utilities would target at least 14% of incentive dollars going to KEDNY territory. Under this scenario, the Downstate Utilities would also report spend by service territory in its annual report and identify ways to address any imbalances.

The Downstate Utilities believe the service territory target, whether projects or incentive spend, should be a goal rather than a strict requirement to allow for the new Regional Weatherization Program to evolve as needed. In addition, this goal should go into effect beginning in the first full year of the program.

4. Customer Eligibility

The Regional Weatherization Program is designed to serve customers of the participating electric and gas utilities. All residential and multifamily electric and gas customers of Con Edison and KEDNY are eligible to participate in the Downstate Regional Weatherization Program.

In its KEDLI service territory on Long Island, National Grid intends to administer the Downstate Regional Weatherization Program with the same structure and requirements for residential and multifamily customers as the KEDNY and Con Ed service territories during the 2026-2030 period. National Grid will continue engaging with PSEG-LI to explore options for a jointly funded and managed weatherization program for gas and electric customers on Long Island. Based on initial discussions, a joint program is unlikely to commence before 2027 because PSEG-LI's program plans, budgets, and targets for 2026 have already been approved by the Long Island Power Authority. The KEDLI budgets and targets in this

implementation plan reflect the Downstate Regional Weatherization Program only being offered to National Grid gas customers on Long Island. Should KEDLI and PSEG-LI agree to a joint program in the future, these budgets and targets would be amended in a subsequent filing.

All activities will be tracked separately to ensure transparency, and customers are kept informed throughout the process. If funding is secured, PSEG-LI customers would receive the same services as others, including audits, installations, and inspections. KEDLI gas customers in Queens County who receive electric service from Con Edison would receive incentives through the combined Con Edison and KEDNY budgets. Similarly, Con Edison gas customers who are PSEG-LI electric customers would receive incentives through the combined Con Edison and KEDNY budgets. At the time of this filing, Con Edison and National Grid are exploring the approximate number of customers that may fall into these categories. This approach may change if PSEG-LI decides to participate in the Downstate Regional Weatherization Program.

5. Key Regional Implementation Vendor Administration Functions

The Downstate Utilities will collaborate to jointly procure a single Implementation Vendor to operate the Regional Weatherization Program. This joint procurement process is designed to streamline program delivery, ensure consistency across service territories, and maximize cost-effectiveness.

The selected Implementation Vendor will serve as a central resource, supporting the Downstate Utilities by managing Participating Contractors, marketing program offerings, generating leads, processing applications, and delivering other essential services to provide for successful program execution. By leveraging a joint procurement approach, the Downstate Utilities aim to achieve two primary benefits: (1) providing a unified point of contact for customers, regardless of their location within the participating service territories, and (2) realizing economies of scale that reduce the overall cost of acquiring and managing program resources.

In addition to implementation services, the Downstate Utilities will also jointly procure an independent evaluation contractor as mentioned above to assess program performance and develop realization rates to determine verified gross savings values, ensuring transparency, accountability, and continuous improvement across the program.

The Downstate Utilities will also procure a separate quality assurance and quality control (“QA/QC”) vendor to perform quality checks on the Implementation Contractor and program processes.

All details related to the below processes will be included in the appropriate Program Manuals.

a. *Application Intake*

Residential: The Regional Weatherization Program will have a simplified application process to make customer participation easy and accessible. Participating Contractors are responsible for completing applications on behalf of customers. The Implementation Vendor supports this process through a centralized platform that enables efficient application submission, tracking, and communication. This streamlined approach reduces paperwork, shortens timelines, and enhances the overall customer experience.

Multifamily: The Multifamily Program will use a single intake application for all multifamily offerings, including weatherization.

b. *Incentive Processing*

Residential and Multifamily: While under the budget pooling approach, incentives will be allocated according to the distribution outlined in the budget and savings breakdown described above, a customer or contractor will receive a single incentive payment from the Implementation Contractor.

c. *Quality Assurance and Quality Control*

Residential and Multifamily: Downstate Utilities will implement inspection and other programmatic processes through the chosen Implementation Vendor to enforce quality standards in the program. This will include:

- Inspections to check quality of installations at all or a sample of projects, depending on program and measure.
- A defined remediation process to address deficiencies or issues identified during inspections.
- Procedures for managing nonconformances, including corrective actions and potential impacts on contractor eligibility within the program.
- Fraud prevention such as requiring post-installation verification from customers that the work was completed before incentives are paid

The inspections described above will be conducted by the Implementation Vendor, who will also be responsible for managing quality and adherence to program rules of Participating Contractors within the Program. To support quality and compliance, a jointly

selected QA/QC vendor will perform desk reviews and/or field inspections to confirm that the Implementation Vendor is ensuring compliance with program rules and requirements.

d. Removal of Participating Contractors for Quality/Non-Performance

The Downstate Utilities will regularly evaluate the performance of contractors participating in the program. If there is a failure by a Participating Contractor, and any other company or organization with ownership or management in common, to behave consistently with the requirements for participation in the Program, then the Downstate Utilities will provide a notice related to the behavior. The notification will outline the behavior found to justify the notification being made, and, as appropriate, any corrective action that must be taken. Repeated failures by a Participating Contractor may lead to suspension or expulsion from the program.

6. Participating Installation Contractor Network

A strong and diverse contractor network is critical to the success of the Downstate Regional Weatherization Program. In alignment with the Non-LMI EE/BE Order, Con Edison, KEDLI, and KEDNY will take coordinated steps to strengthen and expand the existing network previously established through the Weather Ready, Total Home Comfort and Comfort Home programs. These efforts support the Commission's goals of reducing redundancy, maximizing impact, and ensuring equitable access to services across service territories.

To support this goal, the Downstate Utilities will undertake the following actions, as outlined in Table 4.

Table 4: Downstate Utilities' Coordinated Actions

Category	Action
Joint Contractor Recruitment and Outreach	Utilities will collaborate on outreach strategies to recruit qualified contractors from across the region.
Standardized Training and Certification	In coordination with NYSERDA's statewide workforce development initiatives, the utilities will support contractor access to training and certification programs aligned with the Strategic Framework, including building envelope improvements and electrification-readiness.
Technical Assistance and Field Support	The Implementation Vendor will provide contractors with technical guidance and on-site support so that installations meet high-quality standards and comply with program requirements.

Performance Monitoring and Continuous Improvement	Through the Implementation Vendor, utilities will adopt a shared performance monitoring framework to evaluate contractor performance and drive continuous improvement, aligning with the Commission's and Downstate Utilities' focus on accountability and transparency.
Workforce Development Partnerships	The utilities will coordinate with NYSERDA and local workforce development entities to expand the pipeline of trained workers, particularly from Disadvantaged Communities, in support of the Commission's and Downstate Utilities' equity goals.

a. Participating Contractor Requirements

The Downstate Utilities will maintain and publish a list of Participating Contractors who are eligible to perform work under the Downstate Regional Weatherization Program. These contractors may include those specializing in residential and multifamily weatherization services, including insulation, air sealing, and related energy efficiency measures. All requirements for Participating Contractors will be outlined in the Program Manual to provide consistency, quality, and alignment with the program's objectives.

Contractors must submit a Participating Contractor Application providing all required documentation and credentials as outlined in the Program Manual. The Downstate Utilities expect that Participating Contractor applications will be managed by the Implementation Vendor, who will oversee the contractor network. Since Con Edison and National Grid will engage a common Implementation Vendor, this approach centralizes management of the contractor application process and network across both utilities.

Additionally, all approved Participating Contractors must execute a participation agreement with the regional program in order to operate within any participating utility's service territory. These agreements will address utility-specific legal terms and conditions for program participation among other requirements agreed by the utilities.

b. Contractor Roundtables

The Downstate Utilities will host an annual contractor roundtable as a platform for open dialogue, collaboration, and shared learning. This roundtable will:

- Encourage contractors to share on-the-ground experiences and operational challenges.
- Facilitate peer-to-peer learning and the exchange of innovative solutions.

- Provide a forum for feedback on program design, implementation, and support needs. In addition, the Downstate Utilities will regularly speak with individual Participating Contractors to share feedback and understand contractor needs,

The Downstate Utilities will use these forums to determine if additional resources are needed to support contractors in the market.

c. Statewide Collaboration on Workforce Needs

The Downstate Utilities' experience working with contractors enrolled in its programs can meaningfully support NYSERDA's workforce development efforts. To strengthen alignment, the Downstate and Upstate Regional Weatherization Program Administrators will coordinate closely and hold quarterly meetings to review implementation progress, discuss any emerging challenges, and ensure consistency across service territories. As part of this process, the Downstate Utilities will periodically engage with NYSERDA to share feedback and provide in-flight updates. This collaborative approach will help translate insights into timely programmatic adjustments, ensuring that ratepayer funds are used effectively and responsively.

7. Program Marketing/Outreach/Customer Engagement Plan

a. Coordination Among Utilities in the Region with NYSERDA and the Clean Energy Hubs

The Downstate Utilities will identify opportunities to collaborate with NYSERDA on a coordinated regional customer education, outreach, and marketing campaign aimed at promoting awareness and participation in the Downstate Regional Weatherization Program. This would complement utility-specific efforts to engage customers through targeted offers and resources. The campaign may focus on educating customers about the benefits of comprehensive weatherization, including improved home comfort, lower energy bills, and reduced environmental impact. Key components of this effort could include:

- Promotion of whole-home weatherization solutions, encouraging customers to address insulation, air sealing, and ventilation needs comprehensively—especially when transitioning away from fossil fuel systems.
- Educational materials that provide practical guidance on maintaining energy-efficient homes, including tips for maximizing performance and comfort after weatherization upgrades.
- Resources to support safe equipment transitions, such as guidance on replacing fossil fuel water heaters when space heating systems are upgraded, to prevent orphaned appliances and potential safety hazards.

- Promotion of weatherization as a foundational step toward clean heating and cooling adoption, including references to relevant NYSERDA initiatives where applicable.

These efforts may be supported by co-branded marketing campaigns in partnership with NYSERDA and industry stakeholders. Campaigns will be designed to:

- Reach customers most likely to benefit from weatherization based on home characteristics, fuel type, and readiness for upgrades.
- Leverage broad-reach media in high-opportunity geographies to build general awareness.
- Direct customers to a centralized online landing page that segments offerings by utility territory and connects them with qualified contractors.

The Downstate Utilities will also work with the Clean Energy Hubs to coordinate on outreach and other activities that will increase awareness of weatherization offerings and their benefits.

Finally, as outlined in the Joint Utility Customer Platform Implementation plan, the Downstate Utilities will collaborate with NYSERDA to include the weatherization offerings on the MyEnergy website so that customers are able to see all the incentives available to them from both NYSERDA and the utilities.

This regional strategy is part of a broader effort to build customer demand, increase market confidence, and reduce customer acquisition costs for contractors.

b. *Specific DAC Engagement Plan*

The Downstate Regional Weatherization initiative will prioritize Disadvantaged Communities (DACs), with a focus on implementing program enhancements such as targeted marketing campaigns, community outreach, multilingual materials, and partnerships with local organizations and the NYSERDA Clean Energy Hubs to increase awareness and participation. These efforts aim to raise awareness, build trust, and ensure that eligible households are informed about available services and empowered to take full advantage of weatherization opportunities. In addition, the Downstate Utilities may consider additional incentives for projects in DACs.

8. Plan for Multi-Year Commitments (for larger projects) for Approvals and Capital Planning

The Downstate Utilities have successfully worked with customers and implemented budget management procedures in their current programs that allow them to provide incentive commitments to projects that take place over multiple years. The Downstate Utilities intend to continue this practice in the Regional Weatherization program so that customers have the certainty they need to undertake projects.

9. Stakeholder Engagement Plan for Program Development

The Downstate Utilities will conduct targeted outreach to members of the EE/BE stakeholder community to both solicit input on program design and communicate information about the program ahead of its launch. Examples of this outreach may include focus groups with multifamily building owners and contractor roundtables. The Downstate Utilities will also engage with each of NYSERDA's Clean Energy Hubs in their territory to build effective programs, and effective program advocates.

10. Interaction with LMI Offerings

The Downstate Utilities will coordinate with NYSERDA's EmPower+ program so that incentives provided through the Regional Weatherization Program do not exceed those offered to low-and-moderate income customers for comparable measures and scopes of work.[23] However, the Downstate Utilities note that a reasonable payback period for a residential project is around 6 years[24]. To achieve a 6-year payback, a typical single-family project would need an incentive of approximately $8,000, although that amount may decline as the market matures. Because the Moderate Income EmPower+ Incentive level is set at the lower of $6,000 or 50% of the project cost the utilities may have trouble achieving the growth called for in the residential sector.

The Downstate Utilities note that to-date there have been only a limited number of EmPower+ projects in New York City,[25] where current incentives for moderate income customers are $5,000 per project with a cap of 50% of project costs and $10,000 per project for low income customers that covered 100% of the project cost. This suggests that the incentives for these customers are not high enough.

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[23] As required by the Non-LMI EE/BE Order at 30.

[24] NYSERDA, Assessment of Energy Efficiency and Electrification Potential in New York State Residential and Commercial Buildings (2023(, Appendix A, p 11

[25] Pratt Ctr. for Cmty. Dev., *Empower: Advancing Equitable Electrification in New York's Affordable Housing*, https://prattcenter.net/uploads/0124/1706652850133244/Empower_Brief_Final.pdf.

The Downstate Utilities suggest that incentives be capped at the low-income incentive offered through EmPower+ rather than the moderate-income incentive. This would provide more flexibility to allow the Regional Weatherization Program to meet customer needs.

a. *LMI and Non-LMI Programs in Mixed-Income Building Projects*

There are many buildings in the Downstate Utilities' territories that include both LMI and Non-LMI tenants and customers. Buildings will not be allowed to participate in the utilities programs for LMI customers (AMEEP) and Non-LMI (MFEEP) at the same time. The Downstate Utilities envision using a single vendor, or effective coordination between multiple vendors, to support guiding customers and their contractors to the appropriate program based on the income levels of the customers in the building and the best offerings for each building.

b. *Plan for informing income-eligible customers of availability of other programs*

The Downstate Utilities will include information in application materials to make customers aware that there are alternative income-based programs available, including NYSERDA's 1-4 family EmPower+ program and the AMEEP offered by Con Edison and National Grid. Additionally, the shared Implementation Vendors, or vendor coordination, will be able to educate customers about income-eligible alternatives to the Downstate Regional Weatherization program. Information on income-based alternatives will also be included on the Downstate Regional Weatherization program website and in program materials shared with contractors.

11. Interaction with NYS Clean Heat Program

The Downstate Utilities intend to engage periodically with the NYS Clean Heat Joint Management Committee to coordinate program requirements as needed. In addition, Con Edison will continue to offer Clean Heat as part of its residential program along with the new Regional Weatherization program. This cross-program coordination will support the Commission's directives in the Non-LMI EE/BE Order to include a higher tier of Clean Heat incentives for weatherized buildings in 2026 and weatherization as a pre-requisite to receiving Clean Heat incentives in 2028 and later.

a. *Linkage to NYS Clean Heat Minimum Weatherization Threshold*

The Downstate Utilities will coordinate with the NYS Clean Heat Program to enable the Clean Heat program to align its minimum weatherization requirement for an enhanced

electrification incentive with Tier 1 of the Regional Weatherization Program's residential offering.

b. *Coordination with Customer Hand-Off*

The Downstate Utilities will consider ways to encourage weatherization contractors to refer customers to the Con Edison's Clean Heat program. In addition, Con Edison's Clean Heat program will explore ways to encourage Participating Contractors to refer customers to the Regional Weatherization program. The Downstate Utilities will also look to identify potential ways to track the success of the referrals.

12. Interaction with Non-Wires Solutions and Non-Pipeline Alternatives Offerings

The Downstate Utilities as part of a Non-Wires Solutions ("NWS") or Non-Pipeline Alternative ("NPA") may offer incentives in targeted locations for weatherization in their service territories to improve local reliability, reduce the need for new infrastructure, or remove gas incentives. The Downstate Utilities will coordinate so that NWS and NPA programs and the Regional Weatherization program offerings are additive rather than duplicative. This coordination may include providing additional incentives, funded through the NWS or NPA program, that can be combined with incentives offered through the Regional Weatherization Program.

13. Transition Planning from Programs Currently in Market to New Regional Weatherization Programs

a. *Existing Con Edison and National Grid Programs*

Per the Non-LMI EE/BE Order, the Downstate Utilities intend to implement the Downstate Regional Weatherization Program no later than January 1, 2027. If the Downstate Utilities are able to implement earlier, they will do so. Until the implementation of the program, Con Edison will continue to offer its existing programs related to residential and multifamily weatherization to customers. These are:

- Weather Ready, which provides incentives to building owners with 1 to 4 units who air seal and insulate their homes, and
- Multifamily Energy Efficiency Program, which provides incentives to multifamily buildings who complete envelope improvements such as installing insulation in the attic or walls or upgrading their windows.

During this interim period, Con Edison will pay for these offerings using the commodity budgets for weatherization approved in the Non-LMI EE/BE Order and confirmed in the December Letter from Department of Public Service staff. Con Edison will claim both electric and gas savings. Once the Commission approves the final budgets and targets for the Regional Weatherization program, Con Edison proposes to count this activity towards the ordered budgets and targets for the Regional Weatherization Program.

National Grid will continue to offer its existing multifamily weatherization program to KEDNY and KEDLI customers until the Downstate Regional Weatherization Program is implemented. National Grid will utilize approved KEDNY and KEDLI gas budgets and will claim savings towards these gas portfolios. When the Downstate Regional Weatherization Program receives approval, National Grid will use these projects to attain Regional Weatherization targets.

b. *Coordination with the NYSERDA Comfort Home Program*

In addition to Con Edison's programs, NYSERDA's Comfort Home program also provides a weatherization offering to residential customers. As ordered, that program will close once the Regional Weatherization Programs begin.[26] The Downstate Utilities will coordinate with NYSERDA to allow for an orderly wind down of Comfort Home ahead of the implementation of the new program including informing NYSERDA if it will begin prior to January 1, 2027.

IV. Weatherization Budgets and Energy Savings Targets

1. Con Edison and KEDNY Budgets and Targets

As described above, the Downstate Utilities propose a combined regional target and budget to track weatherization activity in Con Edison and KEDNY's service territories. KEDLI will have its own annual budgets and targets as shown in the KEDLI Gas Service Territory Budgets and Targets section below.

The Downstate Utilities also note that they intend to keep currently active weatherization offerings in the market until the Regional Weatherization Program launches. Forecasted 2026 activity includes achievement from these programs.

Table 5: Forecasted Program Spend & Proposed Savings Targets

	2026	2027	2028	2029	2030	Grand Total

[26] Non-LMI EE/BE Order at 31.

Program Spend ($000)	$13,790	$58,629	$104,580	$143,597	$198,176	$518,772
Savings (AMMBtu 000s)	62	204	364	470	610	1,710
Savings (LMMBTu 000s)	1,757	5,751	10,254	13,186	17,014	47,960

Table 6: Forecasted Program Spend ($000s)

	2026	2027	2028	2029	2030	Grand Total
Multifamily	$9,891	$38,376	$75,383	$106,056	$149,909	$379,614
Residential	$3,899	$20,253	$29,197	$37,542	$48,267	$139,158
Total	**$13,790**	**$58,629**	**$104,580**	**$143,597**	**$198,176**	**$518,772**

Table 7: Forecasted Program Savings (LMMBtu in 000s)

	2026	2027	2028	2029	2030	Grand Total
Multifamily	1,426	4,781	8,896	11,489	14,893	41,485
Residential	330	970	1,357	1,697	2,121	6,475
Total	**1,757**	**5,751**	**10,254**	**13,186**	**17,014**	**47,960**

2. Description of How the Proposal Aligns with Minimum Budget Parameters Set Forth in the Order

The budgets and targets detailed in this Implementation Plan meet the minimum spend requirements, but fall short of the savings target by 10%. The Downstate utilities adjusted targets downward due to the removal of the Retail Products Program, which accounted for 35% of forecasted savings in the previous filing at a very low unit cost. Unit costs for measures performed by a contractor will need to be significantly higher to generate the level of interest from customers needed to meet the rapid growth in weatherization called for by the Non-LMI EE/BE Order. Furthermore, incentives will need to grow over time to account for inflation. Table 8 compares unit costs and activity today to forecasted unit costs and average activity across the five years for downstream programs. Lower unit costs

will not create the step change growth required to meet the Non-LMI EE/BE Order's estimated savings targets. As discussed previously, the proposed residential offering described herein seeks to set incentives that reduce the payback period to make weatherization project economics compelling enough to reach project volumes envisioned in this Implementation Plan. Multifamily unit costs reflect a more diverse measure mix, as the Downstate Utilities seek to grow adoption of more expensive measures than attic insulation, such as window replacement and wall insulation. In addition, these unit costs account for the need to attract customers that are not "early adopters" to continue growing attic insulation projects.

Table 8: Comparison of Unit Costs and Activity to Forecasted Unit Costs and Activity

Program	2025F Savings (LMMBtu 000s)	2025F Incentive ($/VG LMMBtu)	Avg Forecasted Annual Savings 2026-2030 (LMMBtu 000s)	Forecasted Incentive 2026 – 2030 ($/VG LMMBtu)
Multifamily	2,130	$3.66	8,297	$8.29
Residential	350	$7.72	1,295	$19.17

Further complicating the ability for the Downstate Utilities to meet the target is the inability to fully launch the Regional Weatherization program at the start of 2026. The Non-LMI EE/BE Order assigns targets for five years, 2026 to 2030, though contemplates implementation by January 1, 2027.

3. Description of Proposed Regional Weatherization Program Budgets and Target Flexibility

The Downstate Utilities propose that the Annual Flexibility as outlined in the Non-LMI EE/BE Order is applied to the budgets and targets listed here. Of importance is the ability for the Downstate Utilities to use any unspent funds at the end of one year in future years. This flexibility will allow the Downstate Utilities to work to meet the cumulative, five-year target even if the program does not scale up as quickly as the Downstate Utilities anticipate.

4. Annual Regional Weatherization Program Budgets (2026-2030) by Funding Source (electric or gas)

Table 9 summarizes average annual and five-year total gas and electric budgets and lifetime MMBtu equivalent ("LMMBtu-e") savings for the Regional Weatherization Program in Con Edison and KEDNY Territories as described in the Non-LMI EE/BE Order.

Table 9: Ordered Annual and Five-Year Total Gas and Electric Budgets

Utility	Ordered Average Annual Program Spend Target ($)	Ordered Average Annual Program Savings Target (LMMBtu-e)	Ordered Total Program Spend Target ($)	Ordered Total Program Savings Target (LMMBtu-e)
Con Edison Electric	$60,955,603	5,904,850	$304,778,015	29,524,250
Con Edison Gas	$28,069,266	2,926,299	$140,346,330	14,631,495
KEDNY Gas	$14,729,551	1,816,143	$73,647,757	9,080,715
Total	**$103,754,420**	**10,647,292**	**$518,772,102**	**53,236,460**

As described in Section 3, the Downstate Utilities are committed to ensuring that an equitable portion of Regional Residential Weatherization projects benefit KEDNY gas customers. The Downstate Utilities anticipate overachieving the formally proposed target of 14% of projects benefitting KEDNY gas customers due to the large proportion of market opportunity within the KEDNY gas service territory. Table 10 shows the number of projects by each gas utility. Table 11 shows an estimate of the number of dwelling units that will be served in each service territory.

Table 10: Number of Projects by Utility 2026-2030

	2026	2027	2028	2029	2030	Grand Total
Con Edison[27]	**973**	**2,117**	**2,830**	**3,413**	**4,126**	**13,459**
Multifamily	152	434	768	960	1,217	3,531
Residential	821	1,682	2,063	2,453	2,909	9,928
KEDNY	**28**	**825**	**1,596**	**2,172**	**2,927**	**7,547**
Multifamily	28	151	361	502	683	1,725
Residential	-	674	1,235	1,669	2,244	5,822
% KEDNY Gas Service Territory[28]	**3%**	**28%**	**36%**	**39%**	**41%**	**36%**

[27] Includes all Con Edison gas customers and all Con Edison electric customers who use oil or electric for heating regardless of their location.

[28] The goal of completing a minimum number of projects in KEDNY's service territory will begin in the first full year of the Program's operation. Until the joint Con Ed/KEDNY program launches, each utility will spend its own budget in its own service territory.

Table 11: Number of Dwelling Units Served by Program[29]

	2026	2027	2028	2029	2030	Grand Total
Combined Downstate	**6,832**	**21,916**	**40,868**	**52,794**	**68,361**	**190,770**
Multifamily	5,929	19,324	37,241	48,259	62,692	173,445
Residential	903	2,591	3,628	4,535	5,668	17,325
Con Edison	**5,922**	**16,188**	**27,599**	**34,377**	**43,351**	**127,437**
Multifamily	5,019	14,338	25,331	31,678	40,150	116,516
Residential	903	1,850	2,269	2,698	3,200	10,921
KEDNY	**909**	**5,727**	**13,269**	**18,417**	**25,010**	**63,333**
Multifamily	909	4,986	11,910	16,581	22,542	56,929
Residential	-	741	1,359	1,836	2,468	6,404

5. KEDLI Gas Service Territory Budgets and Targets

Table 12 summarizes average annual and five-year total gas budgets and lifetime MMBtu equivalent ("LMMBtu-e") savings for the Regional Weatherization Program in KEDLI as described in Non-LMI EE/BE Order. KEDLI assumes lower average incentives and energy savings for residential and multifamily weatherization projects than the joint KEDNY/Con Ed program due to differences in building stock and to allow flexibility for future coordination with PSEG-LI.

Table 12: Ordered 2026-2030 Average Annual and Five-Year Gas Budgets and Targets

Utility	Ordered Average Annual Program Spend Target ($)	Ordered Average Annual Program Savings Target (LMMBtu-e)	Ordered Total Program Spend Target ($)	Ordered Total Program Savings Target (LMMBtu-e)
KEDLI Gas	$11,764,911	2,251,120	$58,824,554	11,255,600

[29] Multifamily projects are assumed to have 33 units per building, based on an estimate of 30,391 SF for small multifamily buildings (per the 2023 NYSERDA Assessment of Energy Efficiency and Electrification Potential in New York State Residential and Commercial Buildings) and an estimated 916 SF/unit for small multifamily buildings (per the Statewide average SF/unit for multifamily, from the 2019 NYSERDA Residential Statewide Baseline Study, Volume 2, Table 4). Residential projects are assumed to have 1.1 units per building, based on program data from the Weather Ready program.

Table 13: KEDLI 2027-2030 Estimated Total Program Budgets

Program	2027	2028	2029	2030	2027-2030 Total
Residential	$8,339,411	$10,945,477	$14,072,757	$18,763,675	$52,121,321
Multifamily	$1,020,197	$1,339,009	$1,721,583	$2,295,444	$6,376,233
Grand Total	$9,359,609	$12,284,486	$15,794,340	$21,059,119	$58,497,554

Table 14: KEDLI 2027-2030 Estimated Savings in LMMBtu-e

Program	2027	2028	2029	2030	2027-2030 Total
Residential	475,431	624,003	802,289	1,069,719	2,971,442
Multifamily	85,402	112,090	144,115	192,154	533,761
Grand Total	560,832	736,093	946,405	1,261,873	3,505,203

Table 15: KEDLI 2027-2030 Estimated Projects

Program	2027	2028	2029	2030	2027-2030 Total
Residential	1,398	1,835	2,360	3,146	8,739
Multifamily	22	28	36	49	135
Grand Total	1,420	1,864	2,396	3,195	8,875

Table 16: KEDLI 2027-2030 Estimated Dwelling Units Weatherized[30]

Program	2027	2028	2029	2030	2027-2030 Total
Residential	1,636	2,147	2,761	3,681	10,225
Multifamily	202	256	330	448	1,236
Grand Total	1,838	2,403	3,091	4,129	11,461

[30] National Grid estimates that approximately 28% of multifamily projects in KEDLI will be for buildings with 5-9 dwelling units and 72% of the multifamily projects will be for buildings with 10 or more dwelling units. Approximately 90% of residential projects will be for single-family homes and one-unit dwellings and 10% of residential projects will be for two-to-four-unit dwellings. National Grid plans to refine these assumptions based on actual project data after the Downstate Regional Weatherization Program launches.

V. Proposed Program Filing and Reporting Schedule

The Downstate Utilities propose the following schedule, contingent on Commission action.

Annual Plans	November 1, 2026
Annual Program Performance Report	April 1, 2027

VI. Appendix

Table A1: KEDLI (Gas) 2026-2030 Budgets and Targets

Planned Budget	2026	2027	2028	2029	2030	2026-2030 Total
Incentives	$252,000	$7,856,455	$10,311,598	$13,257,769	$17,677,025	$49,354,847
Implementation & Marketing	$75,000	$1,503,153	$1,972,889	$2,536,571	$3,382,095	$9,469,707
Total Program Cost	$327,000	$9,359,609	$12,284,486	$15,794,340	$21,059,119	$58,824,554
Non-Labor Administration	$0	$114,815	$114,815	$114,815	$114,815	$459,259
EM&V	$0	$164,592	$164,592	$164,592	$164,592	$658,369
Labor	$877,862	$962,873	$1,000,687	$1,040,014	$1,080,914	$4,962,351
Total Budget	$1,204,862	$10,601,889	$13,564,581	$17,113,761	$22,419,440	$64,904,533
Proposed Savings Target	**$2,026**	**$2,027**	**$2,028**	**$2,029**	**$2,030**	**2026-2030 Total**
Total Savings (LMMBtu-e)	27,600	560,832	736,093	946,405	1,261,873	$3,532,803

Table A2: KEDNY (Gas) 2026-2030 Budgets and Targets

Planned Budget	**2026**	**2027**	**2028**	**2029**	**2030**	**2026-2030 Total**
Incentives	$1,744,007	$7,492,210	$13,385,831	$18,476,242	$25,634,725	$66,733,015
Implementation & Marketing	$40,412	$851,166	$1,496,860	$1,958,912	$2,567,392	$6,914,742
Total Program Costs	$1,784,419	$8,343,376	$14,882,691	$20,435,154	$28,202,117	$73,647,757
Non-Labor Administration	$0.00	$114,815	$114,815	$114,815	$114,815	$459,260
EM&V	$0.00	$219,014	$219,014	$219,014	$219,014	$876,056
Labor	$1,587,652	$1,741,398	$1,809,787	$1,880,911	$1,954,880	$8,974,628
Total Budget	$3,372,071	$10,418,603	$17,026,307	$22,649,894	$30,490,826	$83,957,701
Proposed Savings Targets	**2026**	**2027**	**2028**	**2029**	**2030**	**2026-2030 Total**
Total Savings (LMMBtu-e)	230,154	818,361	1,459,198	1,876,415	2,421,212	6,805,339

Table A3: Con Edison (Electric) 2026-2030 Budgets and Targets

Planned Budget	**2026**	**2027**	**2028**	**2029**	**2030**	**2026-2030 Total**
Incentives	$1,392,141	$31,575,716	$56,414,218	$77,867,615	$108,036,844	$275,286,534
Implementation & Marketing	$519,814	$3,587,215	$6,308,474	$8,255,780	$10,820,199	$29,491,482
Total Program Costs	$1,911,955	$35,162,931	$62,722,692	$86,123,394	$118,857,043	$304,778,016
Non-Labor Administration	$16,162	$396,781	$720,491	$910,764	$1,145,471	$3,189,668
EM&V	$2,519	$105,442	$209,295	$279,358	$373,795	$970,409
Labor	$174,315	$3,331,241	$5,725,274	$6,999,936	$8,399,099	$24,629,865
Total Budget	$2,104,951	$38,996,394	$69,377,752	$94,313,452	$128,775,408	$333,567,957
Proposed Savings Targets	**2026**	**2027**	**2028**	**2029**	**2030**	**2026-2030 Total**
Total Savings (LMMBtu-e)	199,026	3,448,960	6,149,751	7,908,098	10,204,131	27,909,967

Table A4: Con Edison (Gas) 2026-2030 Budgets and Targets

Planned Budget	**2026**	**2027**	**2028**	**2029**	**2030**	**2026-2030 Total**
Incentives	$8,341,514	$13,579,703	$24,261,947	$33,488,365	$46,463,183	$126,134,710
Implementation & Marketing	$1,751,834	$1,542,746	$2,713,072	$3,550,546	$4,653,421	$14,211,620
Total Program Costs	$10,093,348	$15,122,449	$26,975,019	$37,038,911	$51,116,604	$140,346,330
Non-Labor Administration	$129,494	$170,643	$309,860	$391,690	$492,630	$1,494,318
EM&V	$35,505	$45,347	$90,011	$120,143	$160,757	$451,764
Labor	$1,044,469	$1,432,660	$2,462,257	$3,010,448	$3,612,183	$11,562,017
Total Budget	$11,302,816	$16,771,099	$29,837,147	$40,561,192	$55,382,175	$153,854,428
Proposed Savings Targets	**2026**	**2027**	**2028**	**2029**	**2030**	**2026-2030 Total**
Total Savings (LMMBtu-e)	1,378,143	1,483,287	2,644,811	3,401,019	4,388,470	13,295,730