



Honorable Michelle L. Phillips, Secretary  
New York Public Service Commission  
Empire State Plaza  
Albany, New York 12223-1350

September 20, 2024

Re: Case 22-M-0429 - Proceeding on Motion of the Commission to Implement the Requirements of the Utility Thermal Energy Network and Jobs Act.

Matter 24-00515 - In the Matter of Utility Thermal Energy Network Performance Metrics.

## **Background**

Pursuant to the Public Service Commission (Commission) Order Providing Guidance on Development of Utility Thermal Energy Network (UTEN) Pilot Projects, Department of Public Service Staff (Staff) convened several technical conferences to identify proposed UTEN performance metrics and develop agreed upon metrics for use within this proceeding. Staff requested that stakeholders state their agreement or disagreement with justification, on the proposed metrics and data points by September 20, 2024, in Matter Number 24-00515.

This document is in response to the request from the Department of Public Service in advance of the technical conference that will be held on September 30, 2024, to review and discuss stakeholder submissions.

## **Discussion**

The Building Decarbonization Coalition generally supports the revised draft UTEN performance metrics.

There are three points of information that are not currently included in the revised draft metrics, but would be useful to have access to.

- Information about the building envelope of connected customers, including performance and insulation values of facade and roof components.
- Detailed description of building distribution systems for connected customers, meaning how heating and cooling is produced and moved around the building before retrofits and a comparison to the post-retrofit systems.
- Detailed information about customer engagement, including methods of outreach, records of communications used to engage, and demographic and/or economic data of those engaged with.



The section on jobs includes one metric that could be improved. The draft currently includes the following metric:

- Number of jobs (temporary and permanent) during design, construction, and operation of the pilot project

Because it is unclear how the duration of the jobs contained within this metric is determined or reported on, a more helpful approach is to issue a report that includes the number of hours worked by individuals during design, construction, and operation of the pilot project. This metric is otherwise known as a person-hours metric. This metric should also include the type of work conducted.

Additionally, the current schedule of reporting is acceptable, but this timeline should not be extended any further. The data reporting structure allows for third party analysis and the ability to understand if systems are working appropriately and as intended. Without consistent and frequent data reporting on the pilot projects, the development of this industry will be delayed and progress will be stifled. Data reported in as granular a fashion and as often as possible is an underlying tenet of UTENJA and a basic requirement to achieve the goals of the legislation.