

Customer Referral Plan

Jointly Filed By:

The Brooklyn Union Gas Company d/b/a National Grid NY
Central Hudson Gas & Electric Corporation
Consolidated Edison Company of New York, Inc.
KeySpan Gas East Corporation d/b/a National Grid
National Fuel Gas Distribution Corporation
Niagara Mohawk Power Corporation d/b/a National Grid
New York State Electric & Gas Corporation
New York State Energy Research and Development Authority
Orange and Rockland Utilities, Inc.
Rochester Gas and Electric Corporation

Filed: August 22, 2025

Case 25-M-0249

Pursuant to New York Public Service Commission Order Authorizing Low- To
Moderate-Income Energy Efficiency and Building Electrification Portfolio For
2026-2030

Table of Contents

- Glossary of Key Terms and Acronyms1
- 1 Introduction and Overview3
 - 1.1 Introduction Customer Referral Plan to EmPower+ Program3
 - 1.2 Budget & Reporting Framework5
- 2 Utility and NYSERDA Coordination on Referrals6
 - 2.1 Introduction and Summary of NYSERDA and Utility Coordination6
 - 2.2 Activities and Basis for CRP Strategies and Initiatives7
 - 2.2.1 Referral Process and Data – Including Barriers, Challenges, Opportunities7
 - 2.2.2 Customer Profile Analysis13
 - 2.2.3 Customer and Contractor Surveys13
 - 2.2.4 Email Messaging Campaign14
 - 2.2.5 EmPower+ Referral Utility Portal15
 - 2.2.6 Prioritization Criteria15
 - 2.2.7 Regional Clean Energy Hubs16
 - 2.2.8 Impressions Tracking16
 - 2.2.9 Landing Page for EmPower+ Applications17
 - 2.2.10 EmPower+ Projects by Utility Service Territory17
 - 2.2.11 Geographic Distribution of Referrals19
- 3 Joint Strategies19
 - 3.1 Summary19
 - 3.1.1 Referral Framework19
 - 3.2 Referral Coordination Strategies20
 - 3.2.1 EmPower+ Referral Process Evaluation21
 - 3.2.2 Referral Leads21
 - 3.3 Referral Data Transfer22
- 4 Conversion of Referrals24
 - 4.1 Baseline24
 - 4.2 Progress Measurement25

4.3	Progress Meetings	25
4.4	Leveraging Regional Clean Energy Hubs	25
5	Individual Program Administrator Strategies.....	26
5.1	Central Hudson	26
5.1.1	Customer Prioritization Methodology	26
5.1.2	Conversion of Referrals	27
5.1.3	Hubs Engagement	27
5.1.4	General Awareness	28
5.2	Con Edison	30
5.2.1	Customer Prioritization Methodology	30
5.2.2	Conversion of Referrals	31
5.2.3	Hubs Engagement	32
5.2.4	General Awareness	32
5.3	National Fuel Gas.....	33
5.3.1	Customer Prioritization Methodology	33
5.3.2	Conversion of Referrals	34
5.3.3	Hubs Engagement	34
5.3.4	General Awareness	35
5.4	National Grid	35
5.4.1	Customer Prioritization Methodology	35
5.4.2	Conversion of Referrals	36
5.4.3	2 nd Cycle.....	37
5.4.4	Hubs Engagement	37
5.4.5	General Awareness	37
5.5	NYSEG and RG&E	38
5.5.1	Customer Prioritization Methodology	38
5.5.2	Conversion of Referrals	38
5.5.3	Hubs Engagement	38
5.5.4	General Awareness	39

5.6	O&R.....	40
5.6.1	Customer Prioritization Methodology	40
5.6.2	Conversion of Referrals	40
5.6.3	Hubs Engagement	41
5.6.4	General Awareness	42
5.6.5	Website and Information Technology (IT) Enhancements	42
5.7	NYSERDA	43
6	Budget and Reporting Framework	43
7	Appendix 1 - Directives from LMI EE/BE Order for CRP	45

Glossary of Key Terms and Acronyms

This glossary provides definitions of key terms and a listing of acronyms used in this Customer Referral Plan.

Definitions

Applicant: A customer or household that has submitted an EmPower+ application.

Conversion Rate: The percentage of Utility-referred customers who submit an application to the EmPower+ program.

EmPower+ Referral Database (Referral Database): NYSERDA hosted system used by program and Utility staff to transfer and hold a list of Referral(s), linking customer information and energy usage to Applicant(s).

High Usage: Utilities query, at a given cadence, and sort eligible customer referrals by their total energy consumption (i.e., from highest to lowest, in kilowatt hours (kWh) or therms) over the past 12 months, informing the selection of customers, with consideration to Utility-specific qualifying factors as described in [Section 2.2.6](#) and [Section 5](#).

Impressions: Program Administrator led marketing, education, and outreach interactions with customers regarding the EmPower+ program.

Low Income (Customer): Household income at or below 60 percent of Area Median Income (AMI) or State Median Income (SMI), whichever is higher.

Participant: A customer or household that has been approved for services through EmPower+ and has a project in process or completed/canceled.

Participating Contractors: A NYSERDA managed network of companies providing energy efficiency services through the EmPower+ program.

Referral: A customer or household that has been identified as a potential candidate that would benefit from energy efficiency upgrades to reduce energy usage.

Warm Lead: Utility referral, prioritized for high energy usage, sent to NYSERDA whereby the referring Utility has, at a minimum, conducted outreach to that customer via electronic communications consisting of, at least, awareness and education regarding the EmPower+ program and access to the program application.

Acronyms and Abbreviations

CEF – Clean Energy Fund

CRP – Customer Referral Plan

CSR – Customer Service Representative

CTA – Call to Action

CY – Calendar Year

DAC – Disadvantaged Community

DPS Staff – New York State Department of Public Service Staff

EAP – Energy Affordability Program

EE/BE – Energy Efficiency and Building Electrification

EUI – Energy Use Intensity

GNF – Good Neighbor Fund

HEA – Home Energy Assessment

HEAP – Home Energy Assistance Program

HEAT – Home Energy Affordability Team

Hubs – Regional Clean Energy Hubs

IT – Information Technology

LIHEAP -- Low Income Home Energy Assistance Program

LMI EE/BE Order– Order Authorizing Low- To Moderate-Income Energy Efficiency and Building Electrification Portfolio For 2026-2030

NYSERDA – the New York State Energy and Research Development Authority

Program Administrators – NYSERDA and the Utilities (i.e., Central Hudson, Con Edison, National Grid, National Fuel, NYSEG and RG&E, O&R)

WH&S – Weatherization Health & Safety

1 Introduction and Overview

1.1 Introduction Customer Referral Plan to EmPower+ Program

The New York Utilities¹ and the New York State Energy Research and Development Authority (“NYSERDA”) (together, “Program Administrators”) file this 2025 Customer Referral Plan (“CRP” or “Plan”), for referrals of Utilities’ customers to the statewide low- to moderate-income (“LMI”) energy efficiency program, EmPower+, pursuant to the New York Public Service Commission’s (“Commission”) Order Authorizing Low- To Moderate-Income Energy Efficiency and Building Electrification Portfolio For 2026-2030 (“LMI EE/BE Order”).²

The LMI EE/BE Order confirms that “Utility referrals of low-income customers to NYSERDA for service through [EmPower+] has long been a priority for the Commission”³ Therefore, the Commission directs the Program Administrators to “...file for Department of Public Service (“DPS”) Staff review and approval an LMI Customer Referral Plan” and that the CRP should “...include information about the steps [Utilities] will take to ‘warm’ leads or referrals [to] increase the likelihood that a customer will participate in [EmPower+]” while “...document[ing] the referral process and the necessary data points for referrals.”⁴

In compliance with these Commission directives, the Program Administrators are committed to identifying strategies both shared and specific to assess and refine the referral process within the context of the CRP. The Program Administrators also will target Utility-referred customers with electronic and other means of communication to increase awareness of and participation in EmPower+. The strategies and initiatives to achieve this reflect the Program Administrators’ ongoing assessment of barriers, challenges, and opportunities, which are also described in this CRP.

Further, the Program Administrators note that the CRP is an iterative document. The Program Administrators anticipate future CRP filings to refine and update the document. The Program

¹ Central Hudson Gas & Electric Corporation (“Central Hudson”); Consolidated Edison Company of New York, Inc. (“Con Edison”); KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”), The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”), NMPC Power Corporation d/b/a National Grid (“NMPC”)(collectively “National Grid”); National Fuel Gas Distribution Corporation (“NFGDC” or “National Fuel”); New York State Electric & Gas Corporation (“NYSEG”); Orange and Rockland Utilities, Inc. (“Orange & Rockland” or “O&R”); and Rochester Gas and Electric Corporation (“RG&E”), (collectively, “Utilities”).

² Case 14-M-0094, Proceeding on Motion of the Commission to Consider a Clen Energy Fund, Case 18-M-0084, In the Matter of a Comprehensive Energy Efficiency Initiative, and Case 25-M-0249, In the Matter of a Comprehensive Energy Efficiency Initiative, Order Authorizing Low- To Moderate-Income Energy Efficiency And Building Electrification Portfolio For 2026-2030, (May 15, 2025).

³ LMI EE/BE Order, p 56.

⁴ LMI EE/BE Order, p 61.

Administrators commit to providing additional details regarding budget allocation, reporting, and progress toward implementation, in both future CRP and LMI Implementation Plan filings.⁵

Key milestones and timing identified in this CRP are summarized below.

Table 1: Summary of Milestones

Milestones	Timing
CRP Filing	August 22, 2025
LMI IP Filing <ul style="list-style-type: none"> Pending coordination with DPS Staff, Program Administrators may include a workplan that identifies key milestones and deliverables toward development and operationalization of a budget and reporting framework as an Appendix to the LMI Implementation Plan (See Section 1.2 and Section 6) 	October 1, 2025
Proposal for EmPower+ Process Evaluation <ul style="list-style-type: none"> NYSERDA, in consultation and coordination with the Utility Program Administrators, will present a referral process evaluation plan to DPS Staff for consideration and input. (See, Section 3.2.1) 	Q4 2025
Referrals Metrics Dashboard <ul style="list-style-type: none"> NYSERDA will collaborate with the Utilities and DPS to launch a dashboard for tracking and aggregated metrics of referrals by source, their status, and calculate conversion rates. (Section 5.7) 	Q4 2025
Budgeting and Reporting Framework <ul style="list-style-type: none"> Filing to provide additional information on budgeting and reporting frameworks (See, Section 1.2 and Section 6) 	On or about April 1, 2026
Commencement of Joint Referral Leads Strategy <ul style="list-style-type: none"> Commencement of process described in Section 3.2.2. 	To begin upon CRP approval by DPS Staff
Program Administrator and DPS Staff Coordination Meetings (Section 4.3)	Quarterly, upon CRP approval by DPS Staff

Additionally, the CRP includes the following:

- The remainder of **Section 1** describes the budget and reporting framework for this CRP
- [Section 2](#) summarizes key Program Administrator coordination efforts on referrals to date, including key takeaways, which provide important context for and underpin the strategies and initiatives described in this CRP. This section also highlights the barriers, challenges, and opportunities, which are drivers for the strategies and initiatives.
- [Section 3](#) addresses joint strategies the Program Administrators plan to undertake to improve the referral process and conduct electronic outreach. These strategies include prioritization of

⁵ LMI EE/BE Order, p. 44.

referred customers, a process evaluation of the referral process, and enhancing referral leads and data transfer.

- [Section 4](#) discusses the Program Administrators’ approach to increasing the rate at which Utility referrals result in submitted EmPower+ applications. This section discusses progress measurement, coordination among the Program Administrators and with DPS Staff, and engagement with the Regional Clean Energy Hubs (“Hubs”).
- [Section 5](#) provides Program Administrator-specific information on customer prioritization methodology, initiatives to enhance conversion of referrals, engagement with the Hubs, and general awareness activities to support referral conversion.
- [Section 6](#) provides further discussion regarding next steps for the Program Administrators to coordinate with DPS Staff in the development and implementation of the budget and reporting framework discussed in [Section 1.2](#).
- [Appendix 1](#) provides reference to key directives from the LMI EE/BE Order (as well as from coordination with DPS Staff during the CRP development process) and where they are addressed in the CRP.

1.2 Budget & Reporting Framework

As described in the LMI EE/BE Order, the Commission directs NYSEERDA to make available up to three percent of its EmPower+ and upstate multifamily program budgets, a maximum of \$22.9 million, available to the Utilities for referral and coordination activities.⁶ Sections 3-5 describe the proposed activities for which funding may be allocated.

The Program Administrators note, however, that in the LMI EE/BE Order, the Commission did not specify the budgetary mechanism for the Utilities to access this portion of NYSEERDA’s EE/BE program budgets. As such, the Commission did not authorize budget allocations by Utility Program Administrator.

Rather, the LMI EE/BE Order directs Program Administrators to develop recommended funding levels in consultation with DPS Staff based on the identified customer referral and outreach coordination strategies and processes detailed in the CRP, and to include these recommendations within the Initial Plan.⁷ Further, the Program Administrators note that funds budgeted for Utility-administered customer referral and outreach coordination activities will (1) not be available until DPS Staff approves the Plan; and (2) will not impact budgetary and/or reporting consideration of the Utilities’ proportional allocation of end-use EE/BE expenditures (i.e., Money Out The Door metric).⁸

⁶ LMI EE/BE Order, p. 61.

⁷ LMI EE/BE Order, p. 61.

⁸ LMI EE/BE Order, p. 61.

The Program Administrators also note that the processes required to execute the yet to be determined funding mechanism do not exist at the time of filing this Plan. These processes include back-end reporting, reconciliation, and reporting frameworks as well as other potential processes not yet identified. The development of these processes will require significant upfront and ongoing coordination among the Program Administrators. Importantly, it will also be necessary to specify the level of CRP funding and any associated cost recovery.

This lack of an established funding mechanism presents a challenge to produce precise budget estimates at this stage. Without clarity on the cost and volume of customer referrals, the specific administrative processes utilities will employ, and the associated infrastructure and reporting costs, it is not possible to reasonably forecast the full cost of implementation.

Therefore, this plan reflects the prioritization of the shared and Program Administrator-specific customer referral and outreach coordination strategies discussed in Sections 3-5. The development of these strategies reflects the Program Administrator’s consultation with DPS Staff.

Accordingly, [Section 6](#) of this plan includes a high-level overview of how a budget and reporting framework may be developed and made operational. As with other parts of this plan, this section reflects the Program Administrator’s consultation with DPS Staff. Steps toward developing and operationalizing this framework may include using the LMI Implementation Plan as an intermediate vehicle to update DPS Staff and interested Stakeholders on progress toward implementing this Plan.

2 Utility and NYSERDA Coordination on Referrals

2.1 Introduction and Summary of NYSERDA and Utility Coordination

The Program Administrators have coordinated and collaborated over many years in the development and implementation of energy efficiency programs to serve LMI customers in New York, including in the process to support Utilities’ referrals to the EmPower+ program (and its predecessor EmPower NY program for low-income customers). The following describes efforts coordinated among the Utilities and NYSERDA regarding referrals in the New Efficiency: New York (“NENY”) period from 2020-2025 (to date), as well as how these efforts provide the basis for the forward-looking strategies and initiatives discussed throughout this CRP.

2.2 Activities and Basis for CRP Strategies and Initiatives

2.2.1 Referral Process and Data – Including Barriers, Challenges, Opportunities

For many years, the Utilities and NYSERDA have worked closely to develop and refine customer referral processes, consistent with Commission and DPS Staff guidance.⁹ To support the level of coordination needed to maintain ongoing Utility referral processes, the Program Administrators developed and continue to use a range of tools and protocols, many of which underpin the strategies presented in this plan.

For example, NYSERDA initially established the EmPower+¹⁰ Referral Database to collect program leads from Utilities and other entities. The Referral Database has since evolved into a centralized, self-service repository that facilitates both intake of referral leads and enhanced reporting of program activity.

Additionally, the Program Administrators identified information historically included in referral files to evaluate, enhance, standardize, and align the data provided among utilities to the degree practicable. The Program Administrators also track proposed changes and updates to referral data fields, enabling continuous refinement of the process.

Furthermore, the Program Administrators track each Utility’s EmPower+ referral improvement plans, filed in October 2021 pursuant to the Commission’s CEF Modifications Order¹¹, and continue to document updates informed by subsequent coordination efforts.

[Table 2](#) provides additional information regarding the current referral data. In development of this CRP, the Program Administrators have reviewed and sought to enhance the data provided in [Table 2](#). The “revised” version of this table reflects the data to be provided going forward and is shown in [Table 6](#) in [Section 3.3](#)

⁹ See, e.g., Case 18-M-0084, In the Matter of a Comprehensive Energy Efficiency Initiative and Case 94-M-0094 - Proceeding on Motion of the Commission to Consider a Clean Energy Fund (“NENY Proceeding”), Order Approving Clean Energy Fund Modifications (“CEF Modifications Order.”) (Issued and Effective: September 9, 2021), p. 62-63. Per directives from this Order, each utility filed EmPower referral improvement plans in October 2021, which describe historic and current practice and future plan to enhance the Referral process.

¹⁰ The name EmPower+ was formally adopted in 2023 from the former name “EmPower NY.” For purposes of clarity, the term “EmPower+” is used throughout document to refer to both the current EmPower+ program and the prior EmPower NY program.

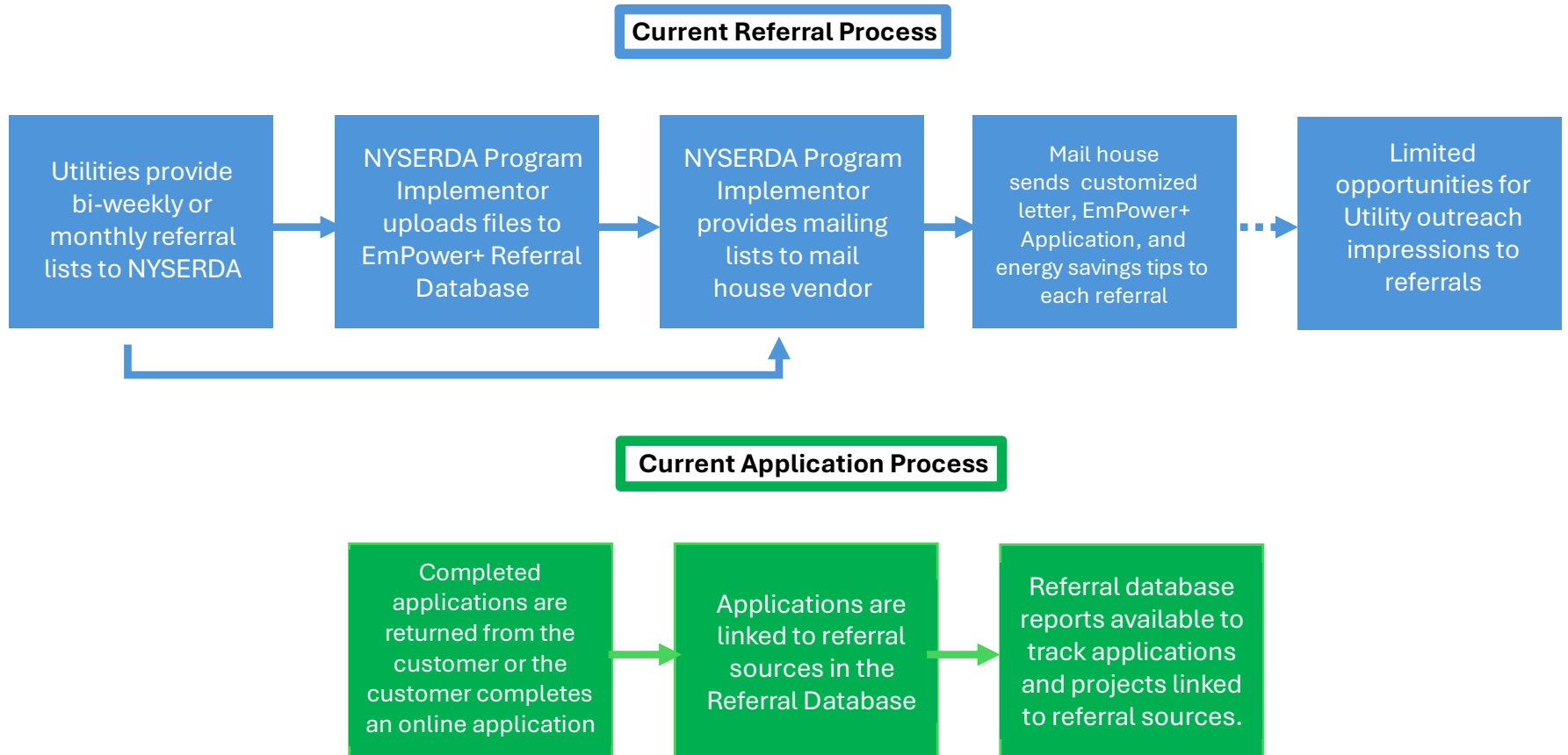
¹¹ New York State Public Service Commission, Order Approving Clean Energy Fund Modifications, Cases 19-E-0735 et al. (issued September 9, 2021).

Table 2. Current Referral Datapoints Provided by Utilities

Field Name	Con Edison	Central Hudson	National Fuel	National Grid - NMPC	National Grid - KEDNY	NYSEG	O&R	RG&E
Electric Account Number	Provided	Provided	N/A	Provided	N/A	Provided	Provided	Provided
Electric Utility Company	Provided	Provided	N/A	Provided	N/A	Provided	Provided	Provided
Natural Gas Account Number	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Natural Gas Company	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
First Name	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Last Name	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Phone Number 1	Provided	Provided	Provided	Does Not Provide	Does Not Provide	Provided	Provided	Provided
Phone Number 2	Provided	Provided	Provided	Does Not Provide	Does Not Provide	Provided	Data Not Available	Provided
Mailing Address	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Mailing Address 2	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Mailing City	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Mailing State	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Mailing Zip	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service Address	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service Address 2	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service City	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service State	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service Zip	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
County	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Rental or Home Owner	Provided	Data Not Available	Provided	Does Not Provide	Does Not Provide	Data Not Available	Data Not Available	Data Not Available
Email	Provided	Provided	Provided	Does Not Provide	Does Not Provide	Provided	Provided	Provided
Months in Arrears	Does Not Provide	Does Not Provide	Provided	Does Not Provide	Does Not Provide	Provided	Provided	Provided
HEAP customer	Provided	Provided	Provided	Does Not Provide	Does Not Provide	Provided	Provided	Provided
Referral External ID	Optional - Agreed by All	Optional - Agreed by All	Optional - Agreed by All	Provided	Provided	Optional - Agreed by All	Optional - Agreed by All	Optional - Agreed by All

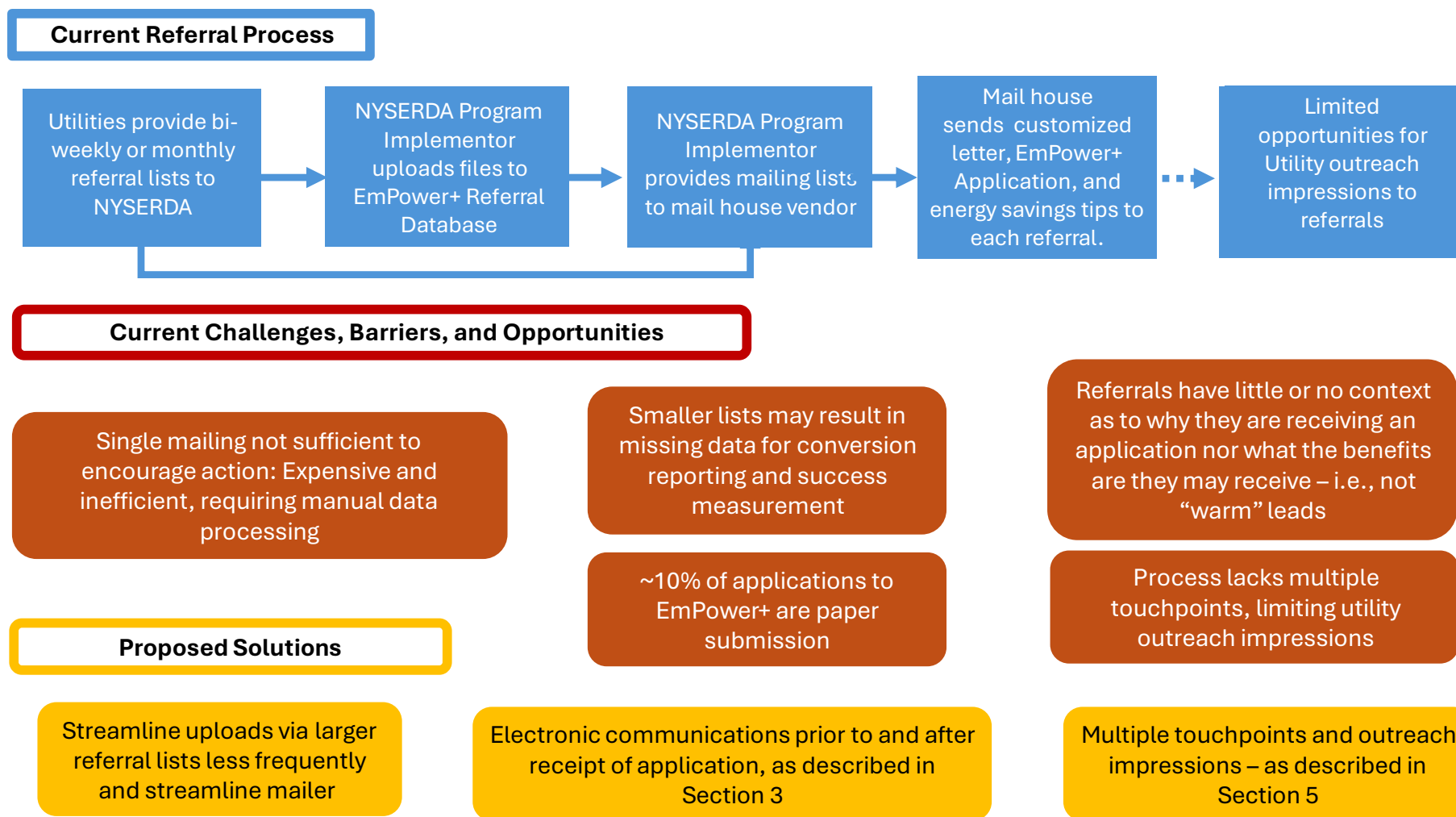
- Utility referrals also include up to 24 months of energy usage information, but this is not shown in this table. The Referral transfer protocol includes a data field to flag “High Need,” however it is recognized that all referred customers are considered High Need and the data field will no longer be utilized.
- The Utilities provide data that is available according to these fields, recognizing that there are cases where a utility may not have a particular data field and no data is therefore provided for that field.

Figure 1: Current Referral and Application Process



[Figure 1](#) illustrates the current referral and application process. Review of the current referral process provides important background regarding barriers, challenges, and opportunities addressed in this CRP. The current referral process identified in [Figure 1](#) addresses two general “buckets” of barriers, challenges, and opportunities: (1) the process for identifying referrals and providing applications; and (2) additional Program Administrator outreach to referrals. In [Figure 2](#), below, the Program Administrators: show again the current referral process; identify current barriers, challenges, and opportunities regarding the referral process that apply to these two buckets; and highlight the proposed solutions in this CRP.

Figure 2: Current Referral Process; Challenges, Barriers, and Opportunities; and Proposed Solutions



[Figure 2](#) illustrates barriers, challenges, and opportunities (represented by the red boxes in [Figure 2](#)) from various “steps” along the referral process (represented by the blue boxes in [Figures 1 and 2](#)). It also shows the high-level solutions proposed in this CRP (represented by the orange boxes).

Some of the barriers, challenges, and opportunities, as well as solutions, relate to parameters regarding the provision of the Utility referrals:

- Monthly uploads could be administratively streamlined by uploading larger referral lists on a less frequent cadence.
- Smaller lists do not necessarily capture the full audience of potentially eligible customers, resulting in applications not captured as a Utility referral. There is missing data in conversion reporting and progress.

These are key drivers for the Joint Referral Leads Strategy described in [Section 3.2.2](#).

Additional barriers, challenges, and opportunities relate to the provision of the application to referred customers and the current lack of and opportunity for enhanced outreach and multiple touchpoints.

- A single mailing to customers is not sufficient for customers to take action and sign up for the program. Recipients may not open mailers due to lack of familiarity.
- Mailed application packages are expensive and the least administratively efficient outreach mechanism inviting customers to submit an online application.¹²
- Requires program implementation staff to manually enter data for returned paper applications.
- Current referral lists do not include “warm” leads, as there is little context offered to the customer as to why they are receiving a program application to EmPower+ nor the benefits they may receive.
- Approximately 10% of applications to EmPower+ utilize the paper application submission process, demonstrating an opportunity to increase electronic communications to drive customer intake.
- The current approach lacks multiple touchpoints, limiting Utility outreach impressions to their referred customers.
- There are opportunities to effectuate a warm lead through enhanced electronic outreach from Utilities at various stages in the outreach and referral processes.

These barriers, challenges, and opportunities are central to the Program Administrators’ development of the CRP, and related activities. Further discussion and detail on these barriers, challenges, and

¹² The Program Administrators recognize the limited response to paper application packages and over time may consider alternative materials for mailings that reduce administrative costs while increasing customer response rates.

opportunities, as well as proposed solutions, strategies, and initiatives to address them, is provided throughout the CRP.

2.2.2 Customer Profile Analysis

To enhance understanding of customer participation in EmPower+ and outreach strategies, utilities conducted an internal-facing customer profile analyses in the Fall of 2022. The goals of these analyses were to assess the efficacy of Utility and NYSERDA outreach efforts, identify trends among participants and non-participants, and identify the feasibility of implementing both Utility and NYSERDA led strategies to increase engagement.

These customer profile analyses of EmPower+ participation included recognition of production gaps across geographical areas and demographic categories, which inform the Utility and NYSERDA-led strategies discussed in Sections 3-5.

Key Takeaways that inform CRP:

- *Analyses resulted in Program Administrators improving reporting, reporting structure, and coordination regarding referrals and applications.*
- *Analyses highlighted the importance of emphasizing Utility referrals to drive customer participation in the EmPower+ program.*

2.2.3 Customer and Contractor Surveys

To evaluate the effectiveness of referral efforts and better understand participation barriers, in Q2 of 2023, the Utilities conducted surveys sent to approximately 24,000 email accounts.¹³ These accounts were utility customers who had been referred to NYSERDA's EmPower+ program, including both participants and non-participants. Related surveys were also distributed to EmPower+ contractors. Conclusions included:

- Program satisfaction: EmPower+ participants reported satisfaction with the program and expressed a likelihood of recommending it to others.
- Unopened mailings: Some participants were not aware that they had received a paper application package inviting customers to participate in the Program.
- Awareness gap: Lack of general awareness about the EmPower+ program was the most common reason indicated by non-participants for having not engaged with or enrolled in the program.

¹³ See, NENY Proceeding, Statewide Low- and Moderate-Income Portfolio 2023 Annual Report (April 1, 2024), p. 14. A summary was presented to stakeholders in the November 22, 2023 LMI Portfolio Webinar Presentation. NENY Proceeding, LMI Stakeholder Webinar Presentation and Stakeholder Summary Report (filed: March 20, 2024).

- Value of trust-based outreach: Contractors reported that contractor-led word-of-mouth outreach and endorsements from past participants were highly effective approaches to encourage engagement with and enrollment in the program.
 - Prospective customers placed more trust in recommendations from familiar sources.

Key Takeaways that inform CRP:

- *There is a need to enhance marketing, education, and awareness efforts targeting Utility referrals, as these eligible participants lack awareness and education about the Program.*
- *Utility referrals and other eligible participants need multiple impressions to become aware of the Program such that they may consider submitting an application.*
- *Surveying referred customers may be an effective vehicle to measure the success of strategies discussed in the CRP.*

2.2.4 Email Messaging Campaign

In the Fall of 2022, the Utilities conducted targeted messaging campaigns to test the effectiveness of email-based outreach to increase Utility customer engagement with EmPower+.¹⁴ Although these efforts were highly limited both in terms of scope and timing, they serve as a foundation for refining and scaling Utility-led outreach strategies consistent with the Commission's emphasis on evolving referral communications to include electronic communications.

The email campaign included three variations of content to evaluate the messaging theme(s) that resonated most with Utility customers. The messages emphasized reducing energy costs; improving home comfort; and receiving free energy-saving upgrades.

Data collected included open rates and click-through rates for each email version. Open and click-through rates were consistent with or exceeded email marketing industry standard.¹⁵ Each message resulted in similar levels of engagement, indicating that all three themes were at that time and may continue to be effective in promoting customer interest in EmPower+.

Key Takeaway that informs CRP:

- *As evidenced by meeting or exceeding industry open and click-through standards, electronic communication is an effective strategy for reaching potential EmPower+ program applicants.*

¹⁴ Statewide Low- and Moderate-Income Portfolio 2022 Annual Report (April 1, 2023) ("2020 Annual Report"), p. 19.

¹⁵ The utilities that participated in this effort (Central Hudson, Con Edison, NFGDC, National Grid, NYSEG and RG&E) tested three different email messages which resulted in average open rates of 42.39%, 35.11%, and 40.07%, respectively, and average click-through rates of 2.9%, 3.25%, and 4.33%, respectively. NENY Proceeding, 2022 Annual Report, p. 19.

2.2.5 EmPower+ Referral Utility Portal

In July 2024, NYSERDA launched enhancements to the EmPower+ Referral Database allowing referral expiration dates to facilitate better follow-up and management of non-responsive customers, automatically linking referral IDs to program applications, updated reporting to include Utility account numbers, and ability for Utility users to search for individual records and view applications tied to specific referrals. The system improves the efficiency of referral intake, processing, and conversion tracking, as well as serving as a foundational element to increase the awareness and education of eligible EmPower+ customers and facilitates reciprocal customer insights for the Program Administrators.

Key Takeaway that informs CRP:

- *Demonstration of Program Administrators' coordination to enhance operational effectiveness in engaging with referred customers.*

2.2.6 Prioritization Criteria

The Utilities and NYSERDA have taken steps to prioritize referrals to improve conversion rates and serve Utility customers with high energy usage. All Utilities prioritize referrals to customers with higher-than-average energy usage.¹⁶ This approach is intended to identify customers with a potentially higher energy burden, thereby improving the effectiveness of outreach and participation in EmPower+. The Program Administrators will continue to build on this foundation, including assessing best practices, evaluating prioritization thresholds, and applying lessons learned that may be gleaned through a process evaluation of EmPower+ as discussed further in [Section 3.2.1](#). Utilities prioritize customer referrals by highest energy usage over the previous 12 months, but may apply additional qualifying factors, as outlined in [Section 5](#).

¹⁶ The following definition for “High Usage” is provided in the [Glossary](#): Utilities query, at a given cadence, and sort eligible customer referrals by their total energy consumption (i.e., from highest to lowest, in kilowatt hours (kWh) or therms) over the past 12 months, informing the selection of customers, with consideration to Utility-specific qualifying factors as described in [Section 2.2.6](#) and [Section 5](#).

Table 3. Current and Prospective Prioritization of Referrals by Utility

Utility	High Usage Criteria for Referral Prioritization
Central Hudson	Prioritizes highest usage EAP and HEAP customers over the past 12-month period
Con Edison	Selects EAP and HEAP customers with minimum energy consumption of 3000 kWh or 800 therms annually. Then prioritizes by highest usage over the course of 12 months
National Fuel	Prioritizes EAP and HEAP customers with usage over 100mcf over the past 12 months
National Grid - NMPC	Prioritizes EAP customers with highest usage over the past 12 months.
National Grid - KEDNY	Prioritizes EAP customers with highest usage over the past 12 months.
NYSEG/RG&E	Prioritizes EAP and HEAP customers with highest usage over the past 12 months
O&R	Prioritizes EAP and HEAP customer with the highest usage over 12 months and HEAP customers

2.2.7 Regional Clean Energy Hubs

NYSERDA-sponsored Regional Clean Energy Hubs are part of ongoing efforts to improve customer referrals and participation, as they are a key resource for increasing program conversions and community-level outreach. While NYSERDA is prohibited from sharing Utility customer referrals with Hubs, since 2023, Utilities have held meetings with and support ongoing coordination with the Hub or Hubs operating in their service territories. Although the scope of the Hubs extends beyond referrals to EmPower+, Utility-specific coordination regarding awareness and education to referred customers is discussed in [Section 5](#). Each Hub has established connections with various departments or representatives across the Utilities. The Program Administrators have developed several internal-facing tools that are used by Program Administrators to track relevant interactions with the Hubs, maintain contact with Hub representatives, and to support improved communication and collaboration.

2.2.8 Impressions Tracking

The Utilities, in coordination with NYSERDA, also developed an internal tracking tool to record and organize all marketing, education, and outreach interactions by the Utilities with customers regarding EmPower+. The tracker includes a dashboard for the Program Administrators to monitor progress, generate internal reports, and facilitate the identification of gaps and opportunities.¹⁷ Outputs and

¹⁷ NENY Proceeding, Statewide Low- and Moderate-Income Portfolio 2024 Annual Report (April 1, 2025) p. 14.

applicable metrics may be shared with DPS Staff in the proposed quarterly meetings described in [Section 4.3](#).

Key takeaway that informs CRP:

- *Reflects need for multiple impressions and provides direction for CRP strategies, including Program Administer-specific strategies identified in [Section 5](#).*

2.2.9 Landing Page for EmPower+ Applications

Informed by collaboration among the Program Administrators, NYSERDA has updated the public-facing landing page for EmPower+ applications. The revised page is now clearer and more user friendly. Utility logos were added to enhance customer recognition. These improvements support customer engagement and program participation by making the application process more accessible and familiar to potential applicants.

Key takeaways that inform the CRP:

- *Highlights the opportunities and need to advance customer recognition of EmPower+ through multiple impressions.*
- *Program Administrators must continue to collaborate to improve the customer experience and support engaged potential participants regarding the EmPower+ program and application process.*

2.2.10 EmPower+ Projects by Utility Service Territory

The tables below illustrate the historic distribution of EmPower+ project completions from 2022 to 2024 by Electric and Natural Gas utility service territory.¹⁸

¹⁸ These two tables reflect the same core data set, which is shown separately by electric and gas utility service territory. Reflective of this, the total for each table is identical. Similarly, the data shown by utility is overlapping between the two tables.

Table 4. 2022-2024 EmPower+ Project Completions by Electric Utility, Across All Funding Sources

Electric Utility Territory	2022	2023	2024	Total	Percent of Total
Central Hudson	252	490	761	1,503	2.1%
Con Edison	2,704	2,449	5,307	10,460	14.7%
National Grid - NMPC	6,635	8,625	10,786	26,046	36.6%
NYSEG	3,073	3,897	4,897	11,867	16.7%
O&R	2,766	1,560	1,873	6,199	8.7%
RG&E	3,162	3,781	5,276	12,219	17.2%
Municipal Electric	330	656	850	1,836	2.6%
PSEG LI	309	291	343	943	1.3%
Total	19,231	21,749	30,093	71,073	100.0%

Table 5. 2022-2024 EmPower+ Project Completions by Natural Gas Utility, Across All Funding Sources

Natural Gas Utility Territory	2022	2023	2024	Total	Percent of Total
Central Hudson	68	129	216	413	0.6%
Con Edison	484	428	788	1,700	2.4%
National Fuel	2,506	3,345	4,130	9,981	14.0%
National Grid - KEDLI	143	108	176	427	0.6%
National Grid - KEDNY	2,063	1,802	3,918	7,783	11.0%
National Grid - NMPC	2,692	3,674	5,092	11,458	16.1%
NYSEG	1,359	1,689	2,172	5,220	7.3%
O&R	2,668	1,447	1,743	5,858	8.2%
RG&E	3,013	3,643	5,116	11,772	16.6%
Corning Natural Gas	31	44	89	164	0.2%
St. Lawrence Gas	9	23	30	62	0.1%
Municipal Gas	25	36	47	108	0.2%
Delivered Fuels	4,170	5,381	6,576	16,127	22.7%
Total	19,231	21,749	30,093	71,073	100.0%

2.2.11 Geographic Distribution of Referrals

To the greatest extent possible, the Program Administrators will work to achieve a balanced distribution of referrals based on the percentage of EE/BE Combined Effective Allocations of Electric and Gas funds¹⁹ that contribute to a balanced distribution of projects across the State.

3 Joint Strategies

3.1 Summary

The overarching objective of the LMI Customer Referral Plan is to meet the directives from the LMI EE/BE Order to improve the quality of LMI referrals and the process for conducting outreach to these referrals. The LMI EE/BE Order directs that NYSERDA and the Utilities:

- Prioritize EmPower+ program services to Utility referred low-income customers with the greatest energy usage
- Leverage existing Utility relationships with their customers to improve the quality of referrals through “warm” transfers from the Utilities to NYSERDA

As such, the Program Administrators are committed to exploring opportunities to overcome barriers and challenges that utility referred customers may face in becoming aware of EmPower+. (See [Section 2.2.1](#) for additional discussion of applicable barriers, challenges, and opportunities.)

Addressing these barriers and challenges should increase the likelihood of these customers submitting an EmPower+ application, which could result in a greater share of LMI utility customer referrals ultimately completing EmPower+ projects.

3.1.1 Referral Framework

3.1.1.1 Customer Prioritization

Utilities are uniquely qualified to continue to identify their highest energy use customers for referrals to the EmPower+ program. Moving forward, the Utilities will continue to prioritize customer referrals with the highest energy usage and establish usage thresholds for referrals as outlined in [Section 5](#).

Program Administrators will collaborate to evaluate energy usage thresholds for lead selection on an ongoing basis, but no less than every six months. With increased outreach and engagement from all Program Administrators, the energy usage thresholds may also be reviewed and adjusted to focus outreach with an eye toward cost containment.

Where possible, electric utilities will seek to prioritize low-income customers:

¹⁹ LMI EE/BE Order, Appendix E, p. 3.

- That use electricity as the primary heating source
- Within the top values of electric usage by Utility territory and as defined by each Utility in [Table 3](#), and further addressed in [Section 2.6](#), [Section 5](#), and as outlined in the [Glossary](#).

Where possible, natural gas utilities will seek to prioritize low-income customers:

- Households within the top values of natural gas usage by Utility territory and as defined by each Utility in [Table 3](#), and further addressed in [Section 2.6](#), [Section 5](#), and as outlined in the [Glossary](#).

Over time, the Program Administrators will work to investigate the feasibility of implementing strategies that may help to identify and prioritize customers with the highest delivered fuel usage. This may be included in the project scope of the EmPower+ Referral Process Evaluation described in [Section 3.2.1](#).

3.2 Referral Coordination Strategies

In [Section 5](#), the Plan offers outreach activities and referral prioritization strategies the Program Administrators may adopt individually or in combination aimed at achieving successful referral strategies that prioritize customers with high energy usage and that may increase the rate at which Utility referrals to EmPower+ ultimately result in submitted EmPower+ applications.

NYSERDA will continue to accept referrals to the EmPower+ program from various sources including but not limited to customer driven applications, Regional Clean Energy Hubs and other community-based organizations, Participating Contractors and other State agencies. This will fill any gaps to meet annual EE/BE production targets and facilitate the completion of projects with non-rate payer funding, such as Regional Greenhouse Gas Initiative, Federal Inflation Reduction Act, New York State Budget, and HEAP funding. As such, NYSERDA will continue to support all customers, including referrals, with braided funding to maximize funding and ratepayer affordability.

Over time, to the extent Utility referral conversion rates increase, NYSERDA may seek to limit non-utility referrals required across EE/BE and other non-rate-payer funding sources.

Ultimately, Program Administrators will establish a referral approach collaborating on priority customer touchpoints. The exact strategies, and the timing and associated messaging of such strategies, may adjust based on to-be-determined success measurement metrics and key performance indicators. All outreach efforts from Program Administrators should emphasize multi-lingual support to the degree possible.

3.2.1 EmPower+ Referral Process Evaluation

NYSERDA will undertake a process evaluation of the EmPower+ program, with an emphasis on outreach, marketing, and the utility referral process. The evaluation may include but not be limited to the following elements.

- An assessment of Program Administrator-led marketing and outreach strategies for the EmPower+ program broadly and specific to Utility referrals.
- An assessment of the feasibility to utilize Utility referral and outreach funding for procuring and contracting with a third-party implementation vendor to coordinate marketing and outreach strategies on behalf of the Program Administrators.
- An assessment of the feasibility of establishing quantitative and qualitative utility referral baselines, including but not limited to conversion rate and customer acquisition cost.
- An assessment of opportunities to streamline and operationalize effective utility referrals that may include but not be limited to the following elements:
 - Strategies that may increase Utility customer recognition of EmPower+ such as co-branded web landing pages on NYSERDA’s MyEnergy customer intake platform.
 - Unique links on outreach materials for tracking and reporting insights.
 - Collaboration with Regional Clean Energy Hubs, including educational tools, such as leveraging a mobile beneficitation lab.²⁰

NYSERDA, in consultation and coordination with the Utility Program Administrators, will present a referral process evaluation plan to DPS Staff in Q4 2025 for consideration and input.

[Section 2.2.1](#) provides further discussion of the barriers, challenges, and opportunities that drive this strategy.

3.2.2 Referral Leads

Every six months, Utilities will transfer to NYSERDA a complete list of prioritized referrals, thereby loading these customers into the EmPower+ Referral Database. Over the six-month period, any customer included in this list that submits an application or completes a project can be attributed to the referral Utility. Concurrently, during each six-month period:

- Program Administrators will perform customer touch point(s) through targeted outreach to the identified customers as outlined in each Utility-specific plan in [Section 5](#), emphasizing electronic outreach.

²⁰ “Mobile beneficitation lab” refers to a mobile, hands-on demonstration space designed to showcase the benefits of home weatherization and clean energy upgrades, aimed at educating and engaging income-qualified customers through in-person events. Such a lab could be used in conjunction with invitation-only events for HEAP income-qualified LMI customers, encouraging on-the-spot applications to EmPower+.

- On a minimum monthly basis, Program Administrators will coordinate to identify a sub-set of the referral lists to receive a mailed application from NYSERDA, enabling additional customer touch points. The Program Administrators recognize the limited response to paper application packages and over time may consider alternative materials for mailings that reduce administrative costs while increasing customer response rates.
- As program applications are received and processed by NYSERDA, the project status will automatically be updated in the Referral Database. This information can then be utilized to target non-responsive customers on a reoccurring basis.
- The approach seeks to minimize overlap of Utility referrals from other sources such as Participating Contractors and self-referrals while providing flexibility for Program Administrators to implement various strategies to warm leads and perform targeted customer outreach.
- Leverages current Referral Database functionality to monitor customer responses and adjust outreach as necessary.

[Section 2.2.1](#) provides further discussion of the barriers, challenges, and opportunities that drive this strategy.

3.3 Referral Data Transfer

Utilities will continue to be responsible for providing NYSERDA with referral leads through the standardized Referral Database upload protocol directly into the Referral Database. As required by the LMI EE/BE Order²¹, each of the Utilities developed, in coordination with NYSERDA, and filed Data Security Agreements.²² For the purposes of Utilities performing electronic outreach to customers and NYSERDA performing mailed outreach as outlined in the joint strategies in Section 3, the proposed data points identified in Table 6, below, are sufficient to meet the needs of the initial strategies.

NYSERDA seeks consistency across all Utility provided data to reduce inefficient processes, better target priority customers such as HEAP recipients, customers in arrears, homeowners/renters, etc., and to minimize outreach and mailing costs. Referral leads transferred will contain the data as outlined below. Over time, as other priority datapoints are identified and available, Program Administrators will work to contemplate modifications of the standardized transfer protocol as appropriate.

²¹ LMI EE/BE Order, p. 177.

²² See, Case 18-M-0376, Proceeding on Motion of the Commission Regarding Cyber Security Protocols and Protections in the Energy Market Place, Statewide Data Security Agreements by each of the Utilities and NYSERDA (July, 2025)

Table 6. Updated Referral Datapoints Provided by Utilities

Field Name	Con Edison	Central Hudson	National Fuel	National Grid - NMPC	National Grid - KEDNY	NYSEG	O&R	RG&E
Electric Account Number	Provided	Provided	N/A	Provided	N/A	Provided	Provided	Provided
Electric Utility Company	Provided	Provided	N/A	Provided	N/A	Provided	Provided	Provided
Natural Gas Account Number	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Natural Gas Company	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
First Name	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Last Name	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Phone Number 1	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Phone Number 2	Provided	Provided	Provided	Provided	Provided	Provided	Data Not Available	Provided
Mailing Address	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Mailing Address 2	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Mailing City	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Mailing State	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Mailing Zip	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service Address	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service Address 2	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service City	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service State	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Service Zip	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
County	Provided	Provided	Provided	Provided	Provided	Provided	Provided	Provided
Rental or Home Owner	Provided	Data Not Available	Provided	Provided	Provided	Data Not Available	Data Not Available	Data Not Available
Months in Arrears	Provided	Provided	Provided	Does Not Provide	Does Not Provide	Provided	Provided	Provided
HEAP customer	Provided	Provided	Provided	Does Not Provide	Does Not Provide	Provided	Provided	Provided
Referral External ID	Optional - Agreed by All	Optional - Agreed by All	Optional - Agreed by All	Provided	Provided	Optional - Agreed by All	Optional - Agreed by All	Optional - Agreed by All

- The Data Access Framework does not allow for inclusion of customer email addresses.²³ Accordingly, the Program Administrators removed this data point from the updated referral data exchange.
- Utility referrals also include up to 24 months of energy usage information, but this is not shown in this table.
- For National Grid, the phone numbers of customers who opt-out of sharing such information are not provided.

²³ LMI EE/BE Order, pp. 58-59.

4 Conversion of Referrals

Increasing the rate at which Utility referrals result in submitted EmPower+ applications is essential to maximizing the impact of EE/BE ratepayer funding and minimizing outreach costs, particularly those associated with direct mailings. Customer outreach strategies that may, if implemented, help to increase conversions are outlined by Utilities in [Section 5](#).

The Program Administrators will work to achieve a balanced distribution of completed EmPower+ based on the funding allocations in Appendix E of the LMI EE/BE Order and noted in [Section 2.2.11](#).

4.1 Baseline

The table below reflects Utility referrals received between 2022 and 2024, and the number of associated program applications received.

Table 7. Referral Conversion to Submitted Applications

Utility Program Administrator	Utility Referrals Received	Program Applications Received	% Applications Received
Central Hudson	25,274	758	3.0%
Con Edison	14,531	450	3.1%
National Fuel	80,034	3,667	4.6%
National Grid - KEDNY	4,179	53	1.3%
National Grid - NMPC	21,987	1,089	5.0%
NYSEG	52,532	2,378	4.5%
O&R	26,689	1,769	6.6%
RG&E	31,465	1,403	4.5%
Total	256,691	11,567	4.5%

Notes:

- Some referrals may be double counted when received by more than one utility
- Some referrals may not be counted when received by other referral sources
- Duplicate referrals from the same entity may not be counted
- National Grid – KEDNY referrals began in September 2024, resulting in a sample size insufficient to draw conclusions.
- In 2024, Con Edison experienced a system issue that temporarily interfered with some customers’ referrals to EmPower+. Con Edison resumed referrals in January 2025 and included the previously excluded customers in subsequent referral batches and

continued to do so until the customers who were erroneously excluded were referred to NYSERDA.

4.2 Progress Measurement

The Program Administrators have worked together to develop and implement reporting capabilities from the Referral Database to allow individual referral status tracking, including those with EmPower+ application submission. From these reports, where data is refreshed daily, the Program Administrators can monitor progress of referred customers. Further, aggregated referral metrics can be provided for Program Administrator and DPS Staff review.

As illustrated in Table 7, conversion of referrals to submitted applications are approximately 4.5% statewide. The Program Administrators will monitor conversion rates of various outreach strategies and identify factors that influence responses from customers. Conversion rates are monitored through the tracking capabilities of the EmPower+ Referral Database and application in-take systems and will inform adjustments to messaging and strategies as necessary to facilitate improvement to the Utility referral process.

The Program Administrators will coordinate with DPS Staff regarding the cadence, form, and function for review of such information (e.g., metric snapshots for referral status monitoring and reporting).

4.3 Progress Meetings

Per the Commission Report on Transition of the LMI Joint Management Committee, filed July 7, 2025, where the “Commission identifies the need for utilities that are not directly administering LMI EE/BE programs to continue to play a role in the LMI EE/BE programming by identifying and referring low-income customers for services under EmPower+”,²⁴ NYSERDA and the Utilities propose to hold quarterly check-in meetings with DPS Staff to review progress and the effectiveness of different outreach strategies.

4.4 Leveraging Regional Clean Energy Hubs

NYSERDA cannot share referral information with the Regional Clean Energy Hubs without prior approval from customers. When EmPower+ cannot address the full needs of the customer premises, the Program will seek to utilize the Regional Clean Energy Hubs to provide additional resources to approved applicants. The LMI Implementation Plan will outline potential strategies for addressing regionality of the Regional Clean Energy Hubs.

²⁴ New York State Department of Public Service, Report on Transition of Low- to Moderate-Income Joint Management Committee, Case 25-M-0249 (July 7, 2025), p. 6.

Further, all Program Administrators commit to engaging with the Regional Clean Energy Hubs to increase customer awareness. As noted in [Section 3.2.1](#), the EmPower+ Referral Process Evaluation will assess collaboration activities and opportunities with the Regional Clean Energy Hubs. Each utility provides additional details regarding coordination with the Regional Clean Energy Hubs in the individual plans in [Section 5](#), below.

5 Individual Program Administrator Strategies

5.1 Central Hudson

5.1.1 Customer Prioritization Methodology

As discussed in [Section 2.2.6](#) and [Table 3](#), Central Hudson provides 1,000 referrals monthly to EmPower+ with a list that includes all Good Neighbor Fund (“GNF”) customers and a random selection of the highest use HEAP and EAP customers with adequate property and contact information in accordance with NYSEERDA's data protocols, to get the total referral list to 1000. Filtering to ensure the removal of prior referrals is done prior to the random selection and to ensure prioritization to customers who have not been referred in any capacity. Central Hudson will modify the current process to migrate away from a random selection of the highest use EAP and Good Neighbor Fund participants for the initial list, to a more refined, curated list that includes the following criteria applied:

- All HEAP, GNF and EAP customers in the initial monthly referral list creation will be included in monthly analysis.
- The referral list will then be evaluated for Energy Use Intensity (“EUI”) - EUI is a metric poised to substantially elevate the precision of the referral process. Operating as a measure of a premise's energy consumption relative to its size, EUI provides a nuanced understanding of energy efficiency. By using existing EUI data for premises in Central Hudson’s service territory – originally employed for LMI property matching – we gain the capability to pinpoint premises exhibiting disproportionately high energy usage and will target the highest 50th Percentile.
- Central Hudson will incorporate propensity modeling into the selection criteria, developed through extensive research with premises in the Central Hudson’s service area, and will identify a customer's likelihood of adopting energy-efficient technologies. In the absence of abundant weatherization program participation data, Central Hudson proposes to focus on selecting the top 50th percentile of premises with the highest propensities to adopt residential heat pumps as it is a strong indicator for willingness to work with contractors to make improvements to their home. This approach ensures a

strategic alignment of program offerings with customer preferences, contributing to increased efficiency and effectiveness of the EmPower+ program.

- Central Hudson will incorporate Aerial Thermal Imaging analysis in 2026 – Utilizing aerial thermal imaging via MyHeat. Further refinement of the initial referral list can help identify homes that exhibit the most need for weatherization. Those customers who fit all of the above criteria (HEAP / EAP / GNF / high energy use / adoption propensity) will be segmented and targeted further, with priority given to those exhibiting the highest heat loss rating and consumption.
- The finalized list will then be used for initial outreach prior to being transmitted to the EmPower+ Referral Database and subsequently used for ongoing targeted marketing, as outlined in [Section 5.1.2](#).

5.1.2 Conversion of Referrals

5.1.2.1 Pre-Referral

Central Hudson is committed to the promotion and adoption of the EmPower+ program for low-income customers within its service territory. To drive increased adoption and in an effort to “warm” the referrals that are sent to NYSERDA, Central Hudson will begin sending emails with information on EmPower+ and include a link to “apply now” with the Utility referral code to all EmPower+ referrals prior to them receiving a mailed paper application from NYSERDA. Example messaging may include, “Central Hudson and NYSERDA are here to help! Act now to reduce your bill and increase your comfort!” or “See if you qualify for free weatherization upgrades!”.

5.1.2.2 Post-Referral

A monthly email will be sent to all EmPower+ referrals approximately two weeks after the EmPower+ application has been mailed by NYSERDA. Emails will include a direct link to the EmPower+ application and will provide the Utility referral code. The email will serve as a reminder that they should have received an application online and include a direct link to the online application.

Additional EmPower+ promotional campaigns are planned and will be targeted to customers based on high energy usage and bill payment trends. These emails will include a direct link to the EmPower+ application as well as contact information for the applicable Regional Clean Energy Hub if they need support in completing the application, or to discuss the program with a trusted and knowledgeable energy advisor.

5.1.3 Hubs Engagement

Central Hudson is actively strengthening its partnership with the Mid-Hudson Regional Clean Energy Hub, fostering a collaborative relationship through regular touchpoints to ensure

alignment and support for customer-focused initiatives. To further enhance this collaboration, Central Hudson staff will participate in the Hub's quarterly all-hands meetings, where they will share updates on new programs, distribute marketing materials, and gather feedback to improve Utility support of the Hubs—particularly during the EmPower+ application process.

Central Hudson will seek to establish dual messaging strategies in partnership with the Regional Clean Energy Hubs and other local organizations that serve customers most in need. Central Hudson and the Regional Clean Energy Hubs will co-host invitation-only events with the goal of driving applications “on the spot.” Working in close coordination with Central Hudson's Consumer Outreach team, these invite only events will be specifically targeted to income-eligible customers and will include an opportunity for customers to scan a QR code to immediately apply to EmPower+ and upon doing so, receive a \$20 to \$30 gift card to a local grocer or business. Central Hudson will also begin to promote in-person Hub Energy Kit sessions via social media and email to HEAP, EAP, Good Neighbor Fund customers.

Additionally, program materials promoting EmPower+ will be made available at local libraries and distributed during events hosted by the Regional Clean Energy Hubs and other community-based organizations, ensuring broad access to information and resources.

5.1.4 General Awareness

In an effort to increase EmPower+ brand recognition, Central Hudson will continue with its current HEAP, EAP, Good Neighbor Fund, and heating and cooling season awareness campaigns, incorporating EmPower+ messaging via newsletter, email, Facebook, Instagram and Twitter. In addition, below are new efforts that will be undertaken to increase awareness of EmPower+, warm referrals sent to NYSERDA and drive customers to apply:

Library Partnership

Central Hudson has partnered with the Mid-Hudson Library System and HomeBoost to provide “BoostBoxes”, which include a thermal camera that attaches to a customer's smart phone and via their app, walks them through performing a “do-it-yourself” (“DIY”) Home Energy Assessment. Customers who enter their information and agree that it can be shared with Central Hudson to access the HomeBoost app will receive a detailed PDF report indicating the areas where their homes need weatherization measures and a personalized video outlining where the measures should be installed.

The BoostBoxes will be made available to local libraries, with a higher concentration in DACs. Information on EmPower+, as well as all other incentive programs that the customer may qualify for, will be included in the app and the PDF report and will be presented to the customer. To additionally support “warm” leads for the EmPower+ program, targeted email marketing of EmPower+ will be performed for those customers who participate and may qualify for

EmPower+ based upon the customer profile. All targeted marketing strategies will include links direct to the EmPower+ application and information on contacting an energy advisor for support and will be tracked via campaign codes to verify effectiveness.

Brochure Development

Central Hudson will develop a new EmPower+ flyer/trifold for distribution at tabling events where Outreach Staff will encourage customers to apply directly. 13,000 copies will be created, and 11,000 will be mailed to eligible customers. The materials will include a QR Code to scan and apply to EmPower+, and the brochure will also be made available to local libraries, the Mid-Hudson Regional Clean Energy Hub and other community-based organizations.

Bill Onsert Messaging

Bill onserts are messaging included in the right-hand column of Central Hudson bills. Central Hudson will begin promoting the EmPower+ programming on its bill onserts in December 2025, alongside the HEAP, EAP and GNF campaigns.

Social Media / Radio Advertising

Targeted radio station advertisements will begin for EmPower+ promotion, with a focus on stations that are within DAC zones. Content and rotation of placements will be reviewed and modified based upon prior year results. Paid ads targeting DAC zones on Meta platforms (Facebook, Instagram), Retargeting ads, and ads on partner websites will also be incorporated into the overall strategy.

Text Messaging

Targeted marketing via text messaging will be under consideration for EmPower+ referrals, following the same approach as the targeted email campaigns to referrals outlined above as part of a planned upgrade of the current messaging platform.

Contact Center

Several applicable resources will be provided for Central Hudson's Contact Center representatives. These include Contact Center FAQs that the representatives reference to provide information on the EmPower+ program to customers who call in, as well as information on the use of the Mid-Hudson Regional Clean Energy Hub as a resource to walk customers through the EmPower+ application process. Contact Center representatives can also provide EAP and GNF customers with an EmPower+ application code to pass the proof of income eligibility steps on the application.

Collections

Central Hudson will seek to have customers who are in arrears with information on EmPower+ at various points in the collections process. Currently, customers who are at various stages in

arrears are asked if they would like to have more information on support programs. Central Hudson will seek to include information in notices sent to customers in arrears informing them of EmPower+.

Central Hudson will also seek to have field collection agents provide customers who are offered a deferred payment agreement, or are set to be shut off, with the new EmPower+ brochure.

5.1.4.1 Website and Information Technology (IT) Enhancements

“My Account” Targeted Marketing

New messaging that is based upon the customer profile will be employed for both the billing portal and the phone application where possible:

- EAP and GNF customers who log into “My Account”, Central Hudson’s customer web portal, will be presented with a pop-up message encouraging them to apply to EmPower+ with a link direct to the application.
- A customizable section on “My Account” will display information about EmPower+ with a link direct to the application for EAP and GNF customers upon login.
- An enhancement currently underway is a new Message Center for customers when logged into their account. Central Hudson will send messages promoting EmPower+ to coincide with other campaigns and align with the pre and post referral messaging outlined above.

5.2 Con Edison

5.2.1 Customer Prioritization Methodology

Con Edison is committed to strengthening its support of NYSERDA’s EmPower+ program to improve the rate at which customers referred by the Company become aware of and engage with the Empower+ program.

As discussed in [Section 2.2.6](#) and [Budget &](#), Con Edison currently provides NYSERDA with customer referrals on a biweekly basis using a secure and automated process developed in collaboration with the Utilities and NYSERDA. Con Edison refers to NYSERDA customers that have received HEAP benefits within the previous 12 months and prioritizes high energy users, using a minimum annual consumption threshold of 3,000 kWh or 800 therm units included per batch. Each referral batch includes up to 500 electric and 100 gas accounts. This process is designed to reflect seasonal variations in HEAP enrollment while maintaining a consistent volume of customer referrals. By targeting high energy users, Con Edison aims to prioritize those customers that may experience greater energy burden relative to other HEAP participants.

For each referred customer the Company transfers to NYSERDA up to 24 months of historical energy usage, or the life-of-account, if less, and additional customer information fields as agreed upon by NYSERDA and indicated in [Section 3.3](#).

5.2.2 Conversion of Referrals

Recognizing that the Commission and DPS Staff deemed that the current EmPower+ outreach practice – whereby Utility-referred customers receive mailed applications with limited prior engagement – has yielded limited success in converting Utility-referred customer to completed EmPower+ applications, Con Edison proposes to implement a customer engagement strategy that leverages multiple communication channels intended to enhance customer awareness of and engagement with EmPower+.

5.2.2.1 Pre-Referral

Con Edison proposes implementing an electronic communications strategy that leverages existing customer relationships to build awareness for the EmPower+ program.

At the time Con Edison furnishes each monthly batch of customer referrals to NYSERDA via safe and secure electronic file transfer, the Company proposes to send targeted emails to those customers included in the referral batch. These pre-referral emails are intended to serve as an introduction for customers to the EmPower+ program. Email communications may include but need not be limited to the following points:

- Key EmPower+ program benefits
- EmPower+ eligibility criteria
- Acknowledgement that the customer has been identified as a strong candidate for the program
- Brief overview of the EmPower+ application process
- Call-to-action link, allowing click through rate (“CTR”) tracking and data that may indicate each customer’s potential level of interest

5.2.2.2 Post-Referral

Following NYSERDA’s initial engagement of Con Edison’s referred customers (e.g., mailing application packets or other educational materials intended to facilitate education of and potential enrollment in the EmPower+ program), the Company proposes to send secondary emails to encourage action. These emails may:

- Reaffirm Con Edison’s support for NYSERDA’s EmPower+ program

- Offer additional guidance regarding NYSERDA EmPower+ resources should the customer need one-to-one assistance on applying to the program, as well as links to other resources for customers experiencing a high energy burden.

5.2.3 Hubs Engagement

In 2026, Con Edison proposes to investigate new opportunities to partner with the four NYSERDA Clean Energy Hubs operating within Con Edison's service territory to host Energy Affordability Resource Fairs. These events could feature workshops and educational sessions on energy efficiency and affordability programs, with dedicated EmPower+ resourcing. The events may serve a wider audience, but targeted invitations may be sent to:

- Customers previously referred to NYSERDA for the EmPower+ program but did not complete the application.
- Customers that are likely to be included in future referral batches, such as those meeting HEAP criteria and qualifying energy usage.

Assuming there is active participation from the Clean Energy Hubs and NYSERDA's EmPower+ team, each event may include specific EmPower+ resources, like:

- A dedicated EmPower+ informational session
- In-person application support

These events would aim to deepen collaboration with the Regional Clean Energy Hubs in Con Edison's service territory, enhance outreach to DACs, and increase awareness of and engagement with the EmPower+ program.

5.2.4 General Awareness

Leverage Existing Digital Communications

Con Edison currently sends energy usage alert emails to customers enrolled in its EAP, offering insights into consumption and billing data. To enhance outreach for the EmPower+ program, Con Edison may explore integrating EmPower+ promotional content within these communications.

By integrating EmPower+ messaging into established customer touchpoints, Con Edison will explore the opportunity to:

- Build customer familiarity and recognition of the EmPower+ program to increase the likelihood of future engagement.
- Engage a broader audience beyond those included in the customer referral batches sent to NYSERDA, touching EAP customers who may benefit from the program, but may not be targeted directly via referrals.

- Leverage existing communication, such as Con Edison’s “Customer News” engagements, to expand EmPower+ outreach and promote increased engagement, while minimizing the need for the allocation of additional staffing or direct financial resources.

Community Event Integration

Con Edison recognizes the effectiveness of face-to-face engagement and may consider implementing strategies to further assist in the promotion of EmPower+.

In 2024, Con Edison’s Customer Outreach team participated in approximately 240 community events across its service territory. These events provide opportunities to connect with customers on energy affordability solutions. Going forward, Con Edison will explore the opportunity to integrate EmPower+ education into these events by:

- Training outreach staff on EmPower+ program details
- Developing co-branded educational materials in collaboration with NYSEERDA

5.2.4.1 Website and Information Technology (IT) Enhancements

Con Edison offers a range of bill-payment assistance and energy-saving tools and resources on the Company’s website, www.coned.com. To encourage customers exploring these resources to also consider enrolling in NYSEERDA’s EmPower+ program, Con Edison will explore the feasibility of identifying and incorporating EmPower+ messaging on the Company’s website, as appropriate. Potential integration points may include:

- Informational pages
 - EAP webpage
 - Payment Plans and Assistance webpage
 - Energy Efficiency Savings for Renters and Homeowners landing site
- Interactive tools
 - Explore Clean Energy Programs search feature

This approach would leverage existing electronic infrastructure and web traffic to increase program visibility by reaching customers at moments when they may be more likely to seek energy efficiency and/or bill-related support.

5.3 National Fuel Gas

5.3.1 Customer Prioritization Methodology

As discussed in [Section 2.2.6](#) and Budget &, National Fuel is dedicated to marketing for the EmPower+ program with a strong focus on outreach and engagement. Currently, National Fuel

sends approximately 3,000 referrals to NYSERDA each month, reflecting the scale of our efforts. To further enhance our marketing for the Customer Referral Plan, National Fuel will continue to seek new referrals for the EmPower+ Program. These referrals are accounts that follow the below criteria:

- New York residential customers with an active account with residency at the premise for at least one year.
- The dwelling must be a single-family or a two-unit dwelling with each unit having its own individual meter.
- The customer must have at least 12 months of usage history, and the account usage must be greater than 100 Mcf annually, with priority given to the customers with the highest usage.
- The customer must have a New York account with a HEAP grant in the current year or a Statewide Low-Income Program ("SLIP")/ EAP designation.
- The customer must not have been referred in the last six months.
- Once National Fuel has generated and compiled the customer referral list, it will be submitted to NYSERDA on a weekly basis.

5.3.2 Conversion of Referrals

5.3.2.1 Pre-Referral

The Company will send out an initial electronic communication via email as well as a postcard, monthly, to the customer referral list prior to the customer receiving a paper application in the mail from NYSERDA. The messaging on the emails and postcards will include educational information on the EmPower+ program and a direct link to the online application. This process will continue each month, as new subsets of customers are referred to the EmPower+ program.

5.3.2.2 Post-Referral

Three months after the referred customers receive the initial email and postcard, the Company will send a follow-up email to all referred customers who have not yet applied to the program. These customers will be identified by pulling reports from the EmPower+ database and comparing them to the initial list of referred customers. These follow-up emails will contain another link to the EmPower+ application.

5.3.3 Hubs Engagement

National Fuel will collaborate with Regional Clean Energy Hubs focusing on providing customers the necessary education and information on the EmPower+ program, such as the benefits, how to apply and where additional program information can be accessed.

5.3.4 General Awareness

National Fuel is committed to focusing on targeted outreach to referred customers, but also recognizes that general awareness remains a key component to assist in promoting and educating customers on the EmPower+ program.

The Company will work with field operations employees to deliver door hangers to customers whose accounts are past due for payment. This is an educational opportunity for these customers as another means of outreach and information on the EmPower+ program and a direct link to the online application.

Additionally, National Fuel will continue to make EmPower+ brochures available at its Customer Assistance Centers (walk-in), of which one is located within a Disadvantage Community while the other two border Disadvantage Communities, to ensure that customers have access to information about the EmPower+ program. The brochures will also be distributed at community outreach events to further raise awareness and educate customers.

Furthermore, National Fuel will implement a targeted social media campaign utilizing geo-fencing that will advertise the EmPower+ program to customers based on select zip codes with high concentration of low-income households.

5.3.4.1 Website and Information Technology (IT) Enhancements

National Fuel will continue updating both its “Fueling Tomorrow Today” and corporate websites with program information as it pertains to EmPower+.

5.4 National Grid

National Grid is committed to building upon its current promotion of the EmPower+ program. This campaign has been deployed for the past 18 months, starting in November 2023 in the NMPC service territory, and beginning in September 2024 in the KEDNY service territory.

Going forward, National Grid will utilize an omni-channel communications plan to help ensure there is a balance between maintaining a steady flow of impressions with the customer while avoiding overwhelming them with too frequent touchpoints. The initial approach will be to follow the overarching Referral Leads strategy described in [Section 3.2.2](#) above.

5.4.1 Customer Prioritization Methodology

As discussed in [Section 2.2.6](#) and [Budget &](#), two separate and distinct sets of 6,000 highest usage customers enrolled in EAP program at the time of the monthly internal data pull, in each of the NMPC and KEDNY service territories, will be targeted for a series of outreach activities over the following 6 months. Each month a new subset of 6,000 highest usage customers at the

time of the EAP data pull will be generated and taken through the following steps, effectively creating an overlapping waterfall of customer subsets at different stages of customer engagement.

Additionally, National Grid intends to leverage the Weatherization Health & Safety (“WH&S”) program to develop warm leads into EmPower+ in the KEDNY service territory.

5.4.2 Conversion of Referrals

5.4.2.1 Pre-Referral

The initial electronic communication will be done via email and serve as the introduction into the program to get customers familiarized with its offerings. The Call to Action (“CTA”) will drive customers to a dedicated webpage for EmPower+ supported by National Grid. The landing page provides an overview of the EmPower+ program, instructions for enrollment, and a direct link to NYSERDA’s registration webpage.

The second touchpoint email will inform the customers that they have been selected for participation in the EmPower+ program based on their usage, reiterate the program’s benefits, and explain the link between weatherization and lowering energy demand to ultimately lower the financial burden of their energy bills. This correspondence will also address NYSERDA’s role as the program administrator to build brand recognition and inform the customer of the subsequent paper application they will be receiving. Finally, the income eligibility waiver code generated by NYSERDA will be provided informing the customers that they have effectively been pre-qualified to make enrollment easier and to help mitigate barriers that impede enrollment.

5.4.2.2 Post-Referral

After the initial emails, the customer data set will be sent to NYSERDA to send the paper application mailer. This will serve as the third touchpoint with customers.

Thereafter, National Grid intends to send a follow-up, reminder email to reinforce all information provided in earlier correspondence and reemphasize the importance of applying into the program. The email will include a direct link to NYSERDA’s registration webpage, and explain that the customer will need to register and create an account.

Finally, another reminder email and/or postcard will be sent to customers to complete the initial 6-month cycle of impressions on the customers, urging them to complete the application.

Postcards will be used as an outreach strategy for those customers that do not have an email address on file with National Grid. Due to cost considerations, there will be fewer touchpoints through direct mail outreach to non-digital customers than those receiving emails in the 6-month period, but National Grid estimates at least two touchpoints during that timeframe.

5.4.3 2nd Cycle

In keeping with NYSERDA's newly established 6-month referral expiry, all customers who did not apply from the referral batch 6 months prior will be re-referred into the program and the following outreach strategies may be tested.

National Grid intends to explore the viability of implementing a reward system (with a small monetary value) for first-time applicants to the program.

Another strategy National Grid would like to test, subject to coordination with NYSERDA, is communicating with customers about a single measure to interest customers in the program by creating clarity around a tangible benefit or service. This approach has been very successfully utilized as part of National Grid's HEAT program administered in its KEDLI service territory. Specifically, the offer of a no-cost Clean and Tune service for natural gas heating equipment has been tendered to customers, with the condition that they sign up for the Home Energy Assessment ("HEA"). Through this approach, customers find value in obtaining a no-cost clean and tune and are much more inclined to apply for the HEA. National Grid would like to adopt a similar approach to motivate customers to apply to EmPower+ program. In collaboration with NYSERDA, the intent is to identify a single measure that could be promised in advance as part of the initial messaging to every LMI customer regardless of their premises' needs for any follow-on work after the HEA.

National Grid will also look for opportunities to develop and deploy micro-outreach campaigns based upon geographic location to leverage customers' local affinity to their neighborhoods as part of messaging, effectively presenting a local feel to the EmPower+ program.

Finally, while the current approach to providing the referral file aligns with the Commission's direction to prioritize higher-usage income-eligible customers, National Grid will explore whether combining high usage with other factors may drive increased participation in EmPower+.

5.4.4 Hubs Engagement

National Grid will seek to hold in-person events in collaboration with the Regional Clean Energy Hubs and specifically invite referred customers to these events in addition to the broader LMI customer base.

5.4.5 General Awareness

National Grid intends to continue promoting the EmPower+ program via a broader, blanket approach to all LMI eligible customers by including messaging in existing communication channels such as quarterly newsletters, bill inserts, in-person events, and Consumer Advocates' community outreach.

5.4.5.1 Website and Information Technology (IT) Enhancements

At this time National Grid does not plan to make any updates to its EmPower+ dedicated webpage, but will continue to evaluate in the future.

5.5 NYSEG and RG&E

5.5.1 Customer Prioritization Methodology

As discussed in [Section 2.2.6](#) and [Budget &](#), NYSEG and RG&E currently refer customers to the EmPower+ program, with priority given to those enrolled in HEAP and EAP. To enhance this referral process, NYSEG and RG&E will conduct monthly reviews of EAP and HEAP participants targeting the highest energy usage over the past 12 months, focusing on the top 3,000 customers, which represent approximately the top 10% of all program participants. In addition, NYSEG and RG&E will implement a “pre-warmed” referral approach—outlined in the following section—to boost customer engagement and simplify enrollment into the program.

5.5.2 Conversion of Referrals

5.5.2.1 Pre-Referral

When NYSEG and RG&E send monthly customer referrals to NYSERDA, NYSEG and RG&E will also send targeted emails to those included on the referral list. These pre-referral emails will introduce customers to the EmPower+ Program, provide a link to the online application, and offer direct contact with the Energy Efficiency Team via a dedicated inbox. Inbox support will be available to assist with applications and respond to program-related inquiries.

5.5.2.2 Post-Referral

NYSEG and RG&E will send reminder emails after NYSERDA mails the EmPower+ applications. Additionally, NYSEG and RG&E will utilize the EmPower+ database to generate monthly reports identifying referred customers who have not yet enrolled. A range of outreach strategies will be implemented to further engage these customers including emails, targeted outreach events, and outbound calls conducted by a live agent.

5.5.3 Hubs Engagement

NYSEG and RG&E will continue working with Regional Energy Hubs by inviting them to participate in targeted outreach events that offer face-to-face engagement, EmPower+ education, and application assistance.

5.5.4 General Awareness

To strengthen program awareness, NYSEG and RG&E will promote EmPower+ through the following initiatives:

Text Messages:

Text messaging campaign to customers on referral list that includes benefits of the EmPower+ and contact details for application assistance.

Emails:

Email campaign to customers on referral list that includes benefits of the EmPower+ and contact details for application assistance.

Automated Phone Calls:

Pre-recorded messages to customers on referral list that includes benefits of the EmPower+ and contact details for application assistance.

Paid Media Campaigns:

Paid media campaign to promote EmPower+. The channels may include but not limited to: digital advertising, radio, transit advertisements and print.

Internal Media Campaigns:

Continue EmPower+ promotion through NYSEG and RG&E's earned media efforts, customer newsletters, customer emails, and owned channels such as webpages.

Walk in Office Message Stands:

Continue to promote EmPower+ through messaging at NYSEG and RG&E's walk-in offices across our service territories.

Direct Mail:

Direct mail to customers on referral list that includes benefits of the EmPower+ and contact details for application assistance.

Flyers:

Flyer creation dedicated to promoting EmPower+ at targeted outreach events. Collateral to include QR code to online application and specific utility codes to bypass supporting bank documentation prompts.

Customer Service Representatives (CSR):

Customer service representatives at NYSEG and RG&E are trained in the EmPower+ program and equipped to support customers seeking assistance with energy bills or usage concerns. When such inquiries arise, CSRs proactively educate customers about the benefits and eligibility criteria of the EmPower+ program, emphasizing its potential to improve energy efficiency and reduce costs. Customers are then referred to the NYSERDA website for comprehensive information and guidance on how to apply.

Utility Partnership

NYSEG and RG&E will continue discussions with Central Hudson about potential collaboration for library initiative utilizing “Boostboxes” to support “warm” leads and providing customers with tools to perform a DIY home energy assessment.

5.5.4.1 Website and Information Technology (IT) Enhancements

NYSEG and RG&E offer a wide range of online tools and resources to help customers manage their energy usage and billing. To enhance support for those exploring these options, NYSEG and RG&E are evaluating opportunities to feature the EmPower+ program more prominently across their digital platforms.

Beyond website updates, NYSEG and RG&E will continue to conduct comprehensive reviews of all related materials—including webpages, printed handouts, and outbound communications—to ensure consistent and effective promotion of the EmPower+ Program.

5.6 O&R

5.6.1 Customer Prioritization Methodology

As discussed in [Section 2.2.6](#) and [Budget &](#), O&R will begin using HEAP TIER categories to target customers who may have a higher energy burden. For example, TIER 1 customers receive lower credits than TIER 3 customers due to their higher income levels. As a result, a HEAP TIER 3 customer will be prioritized for referral to the Empower+ program. This list will be cross-referenced with customers that have received shut-off notices in the past sixty (60) days, as well as those with multiple months of arrears.

5.6.2 Conversion of Referrals

5.6.2.1 Pre-Referral

O&R will “pre-warm” Empower+ referrals by including them in an email campaign that notifies customers about the referral being sent to NYSERDA, explains NYSERDA’s role, and describes the

Empower+ program. Customers who receive the Empower+ “pre-warming” email campaign will be referred to NYSERDA during the same month via NYSERDA’s referral portal.

- Each month 1,500 referrals will be generated and prioritized based on the total energy usage of the home, the HEAP TIER received, and whether they have received a shut-off notice in the past sixty (60) days. Customers referred to the Empower+ program will be added to an email list to receive O&R’s referral emails.
- The email list will be updated each month as new referrals are prioritized and identified. Recipients who click the "Unsubscribe" link in any referral email will be directed to the O&R Email Preference Center, where they may elect to opt out of receiving emails.
- Emails will be scheduled to reach customers one to three times before they receive a physical application and information from NYSERDA by mail.
- Emails will contain but not be limited to:
 - Notice that the customer will be receiving information from NYSERDA based on their potential eligibility for Empower+.
 - Information about NYSERDA.
 - Information about the Empower+ program.
 - Links to immediately apply for the program.
 - Links to websites with more information.

5.6.2.2 Post-Referral

Data available from the email campaign, NYSERDA’s portal, and Empower+ monthly completed jobs report will be used to analyze and enhance the referral process.

Re-occurring, non-participating customers will be identified and added to an “Energy Efficiency Education” marketing campaign and invited electronically to in-person events.

Customer will receive personalized messaging from the Customer Energy Services team regarding their eligibility. Information about the benefits of weatherization and electrification along with information about NYSERDA’s free direct-install Empower+ program will be included.

The campaigns will be evaluated on a regular basis and updated as needed.

Customers that do not have an email address on record will be added to a physical mailing list. The mailer will contain the same messaging as the email campaign and include QR codes to facilitate enrollment and aid in program tracking.

5.6.3 Hubs Engagement

Regional Clean Energy Hub members will be invited to collaborate with O&R at in-person events to increase program awareness and participation.

5.6.4 General Awareness

O&R recognizes the effectiveness of face-to-face engagement and may consider implementing strategies to further assist in the promotion of EmPower+.

In 2024, O&R's Customer Energy Services team participated in multiple community events across its service territory. These events provided opportunities to connect with customers on energy affordability solutions including the Home Energy Assistance Program ("HEAP") and EmPower+. Going forward, O&R will continue to integrate EmPower+ education into these events by:

- Training outreach staff on EmPower+ program details.
- Developing co-branded educational materials in collaboration with NYSERDA.

As customers are identified during outreach and applications are received, those applications will be submitted to NYSERDA. Those applications should take priority over other referrals, regardless of energy usage levels.

Internal Education/Updates-

O&R will continue to update CSRs, who are the front-line employees at its call centers and walk-in offices, regarding the Empower+ program, HEAP enrollment, and any relevant changes or updates for customers. Currently, O&R's Customer Energy Services team presents program updates to the CSRs at least twice per year.

Electronic Communication-

O&R is committed to using email as its primary form of electronic communication. The Company reserves the use of text messaging exclusively for emergency notifications including, storms, power outages, and demand response events.

5.6.5 Website and Information Technology (IT) Enhancements

O&R offers a range of bill-payment assistance, energy-saving tools, and resources on the Company's website, www.ORU.com and includes a dedicated section on energy affordability to help guide customers who need bill payment assistance. To encourage customers exploring these resources to also consider enrolling in NYSERDA's EmPower+ program, O&R incorporates EmPower+ content on the Company's website, as appropriate.

This approach leverages existing electronic infrastructure and web traffic to increase program visibility by reaching customers at moments when they may be more likely to seek energy efficiency and/or bill-related support.

5.7 NYSERDA

A weekly provisional approval process was established in Q2 2025, providing EmPower+ staff with a tool to fund projects based on select prioritization criteria, including referral sources, program funding criteria, and proposed measures. Projects flagged as a Utility referral, including those transferred to NYSERDA from each utility, are assigned as the highest priority of projects to receive funding.

NYSERDA will collaborate with Utilities on an ongoing basis to define priority customers, including highest energy usage by utility territory.

To further facilitate referral tracking, monitoring conversion rates, and maximizing the use of rate-payer funding for Utility referrals, NYSERDA will:

- Initiate a process evaluation of program referrals as outlined in [Section 3.2.1](#).
- Collaborate with the Utilities and DPS to launch a dashboard for tracking and aggregated metrics of referrals by source, their status, and calculate conversion rates.
- Integrate aggregated referral metrics into public facing dashboard for greater transparency of program referrals and effectiveness.
- Maintain and support Utilities use of the EmPower+ Referral Database, update data extracts for reporting and update as needs evolve for tracking and managing referrals.

As outlined in [Section 3.2.2](#) NYSERDA will provide direct mailings inviting Utility referred customers to participate in EmPower+. NYSERDA will collaborate with Utilities to phase out application packages to customers, replacing it with a simpler and more cost-effective mailer.

While NYSERDA cannot share referral information with the Regional Clean Energy Hubs without prior approval from customers, NYSERDA will support, as needed, individual Utility efforts to collaborate with the Hubs and their targeting of prioritized customers for EmPower+ services.

6 Budget and Reporting Framework

As discussed in [Section 1.2](#), the Program Administrators are responsible for coordinating with DPS to develop and operationalize a budget and reporting framework that can allow for the Utilities to access the amount of NYSERDA's authorized EE/BE budgets necessary to administer the Utility-led customer referral and outreach coordination strategies as discussed in Sections 3-5 of this Initial Plan.

Accordingly, the Program Administrators will submit a proposed workplan that identifies key milestones and deliverables toward development and operationalization of a budget and reporting framework for consideration to DPS Staff. Pending coordination with DPS Staff, this may be included as an Appendix to the LMI Implementation Plan. An example of a deliverable

may be a CRP Budget filing on or about April 1, 2026, that would codify the budget and reporting framework and forecast planned expenditures associated with customer referral and outreach coordination strategies covering the duration of the LMI EE/BE Portfolio 2026-2030 funding period.

7 Appendix 1 - Directives from LMI EE/BE Order for CRP

This Appendix outlines the directives from the Order that pertain to the development and content of the CRP. It also reflects coordination by the Program Administrators with DPS Staff on the development of the CRP.

Table 8 Summary of CRP-Related Directives from the LMI EE/BE Order and DPS Staff Coordination

Topic	Directive(s)	Source of Guidance	CRP Section Reference/ Notes
Referral Context and CRP Objectives and Issues Addressed.	<ul style="list-style-type: none"> • Provide a brief history of prior Utility referral efforts, highlighting key successes and challenges. • This plan should address identified issues and aim to improve referral rates and coordination. • Once approved, the plan must be implemented promptly. • NYSERDA and the Utilities should work together to enhance intake, referral systems, and data exchanges by establishing consistent procedures for identifying eligible customers, communicating program eligibility, and streamlining referrals. 	LMI EE/BE Order, pp. 55-62 ²⁵ ; DPS Staff Coordination	<ul style="list-style-type: none"> • Section 2 summarizes the historical referral process and areas of focus to date, including identification of issues addressed by strategies. • All sections address next steps pending approval. • Sections 3-5 describe work among NYSERDA and the Utilities to enhance several aspects of referrals.
Geographic Distribution of EmPower+ Projects	<ul style="list-style-type: none"> • Include a breakdown of completed EmPower+ projects by Utility territory, economic development region, county, or census tract. Identify areas with the greatest potential to improve referrals and support balanced statewide distribution. • While no quotas are set, NYSERDA must assess barriers in underserved regions and propose strategies to increase participation. 	LMI EE/BE Order, pp. 61-62 ²⁶ ; DPS Staff Coordination	<ul style="list-style-type: none"> • Section 2.2.10 and 2.2.11 summarize the EmPower+ projects by Utility service territory and the geographic distribution of referrals.

²⁵ LMI EE/BE Order, pp. 55-62

²⁶ LMI EE/BE Order, pp. 61-62

Topic	Directive(s)	Source of Guidance	CRP Section Reference/ Notes
Data Sharing and System Protocols	<ul style="list-style-type: none"> • Describe the types of data to be shared through the referral process, including EmPower+ application data to help identify eligible customers. • Specify any required referral documentation and note discrepancies with the DPS Data Access Framework or Statewide Data Security Agreements. • Indicate if new data sharing agreements or customer attestations are needed. • The CRP should also outline strategies to improve referral outcomes, including shared eligibility data, training, follow-up, feedback loops, and protocols that comply with applicable laws. Include a summary table. 	LMI EE/BE Order, pp. 58-59 ²⁷ ; DPS Staff Coordination	<ul style="list-style-type: none"> • Section 3.3 summarizes current practices and considerations related to referral data transfer.
Referral Process Design and Implementation	<ul style="list-style-type: none"> • Outline the steps Utilities and NYSERDA will take before, during, and after a referral to ensure alignment and efficiency. • Identify how the process addresses known issues and how referrals will be tracked, reported, and used to improve outreach and enrollment. • Include a detailed description of the referral process, supported by visual aids, and define how high-need customers will be identified and what constitutes a referral. Examples may include customer lists, application links, or other referral methods. • Utilities should prioritize high-burden customers and use email or text outreach. NYSERDA must manage the referral pipeline to ensure completion, define 'participant' separately from 'referral' or 'applicant,' and describe coordination with Clean Energy Hubs and other programs. • Indicate if the referral process will vary across strategies. 	LMI EE/BE Order, pp. 56-57 ²⁸ ; DPS Staff Coordination	<ul style="list-style-type: none"> • Section 2.2 describes the current referral process, including prioritization. • Section 3.1 summarizes the referral framework and key design elements. • Section 3.2 outlines coordination strategies to improve referral processes, including an evaluation of the EmPower+ referral process and identification of referral lead strategies. • Section 5 outlines the individual Program Administrator Strategies
Conversion Strategies and Outcome Tracking	<ul style="list-style-type: none"> • Outline strategies Utilities will use to improve referral conversion, including how they will leverage customer relationships to support enrollment. • Include both short- and long-term approaches. • Utilities must track and report outcomes such as follow-up status, enrollment, and service delivery to inform ongoing improvements. 	LMI EE/BE Order, pp. 57-59 ²⁹ ; DPS Staff Coordination	<ul style="list-style-type: none"> • Section 4 outlines the referral conversion process, including the baseline, progress measurement, and key performance indicators.

Topic	Directive(s)	Source of Guidance	CRP Section Reference/ Notes
Budget and Resource Planning	<ul style="list-style-type: none"> • Provide estimated allocations and justifications for the use of up to three percent of NYSERDA program funds to support Utility referral needs. • Include cost estimates for each activity to be performed, the associated resources required, and any proposed payment schedules or milestone-based structures intended to improve success rates. 	DPS Staff Coordination	<ul style="list-style-type: none"> • Sections 1.3 and 6 detail the budget and reporting framework • Section 6 outlines the Program Administrators’ responsibility to work with DPS Staff to develop and implement a budget and reporting framework that enables Utilities to access NYSERDA’s authorized EE/BE funds.
Evaluation and Monitoring Progress	<ul style="list-style-type: none"> • Explain how the referral process will be evaluated, including metrics for success and opportunities for ongoing improvement. • Describe methods for tracking referral conversions and any needed database updates to allow DPS Staff to monitor progress without added reporting. • Indicate whether regular meetings with DPS Staff are needed or if existing meetings are sufficient. 	DPS Staff Coordination	<ul style="list-style-type: none"> • Section 4 outlines the referral conversion process, including the baseline, progress measurement, key performance indicators, and proposed meeting approach with DPS Staff.

²⁷ LMI EE/BE Order, pp. 58-59

²⁸ LMI EE/BE Order, pp. 56-57

²⁹ LMI EE/BE Order, pp. 57-59