



**Environmental  
Defense  
Fund**

**REWIRING  
AMERICA**



**COMMENTS OF ENVIRONMENTAL DEFENSE FUND, REWIRING AMERICA,  
AND ALLIANCE FOR A GREEN ECONOMY  
ON  
CON EDISON’S DRAFT HEAT PUMP OPERATING ECONOMICS CUSTOMER  
ENGAGEMENT PLAN**

June 18, 2026

Filed in Cases 25-E-0072 & 25-G-0073, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric & Gas Service

Alliance for a Green Economy (“AGREE”), Environmental Defense Fund (“EDF”), and Rewiring America (jointly “Commenters”) respectfully submit feedback and recommended improvements regarding the Draft Heat Pump Operating Economics Customer Engagement Plan (“Draft Plan”) filed by Consolidated Edison Company of New York (“Con Edison” or “the Company”) in the above-referenced proceeding on April 21, 2026.<sup>1</sup>

On January 22, 2026, the Commission approved a Joint Proposal establishing a three-year rate plan for the Company.<sup>2</sup> The Joint Proposal, in relevant part, requires that the Company develop and implement a Heat Pump Operating Economics Customer Engagement Plan that promotes rate options benefiting heat pump customers in Con Edison’s Clean Heat program literature; outlines marketing strategies for targeting heat pump customers; includes educational initiatives and tools for key stakeholders; and incorporates rate comparison tools “to residential customers that have adopted heat pumps, [electric vehicles (“EVs”)] and other priority [distributed energy resources (“DERs”)] through a Company program[.]”<sup>3</sup> The Joint Proposal requires that the Company hold a stakeholder engagement session to discuss the Draft Plan, which was held on May 21, 2026, and “[c]onsider written stakeholder comments” on its Draft Plan that are

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<sup>1</sup> Cases 25-E-0072 & 25-G-0073, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric and Gas Service*, Draft Heat Pump Economics Customer Engagement Plan (Apr. 21, 2026) [hereinafter Draft Plan].

<sup>2</sup> Cases 25-E-0072 & 25-G-0073, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric and Gas Service*, Order Adopting Terms of a Joint Proposal and Establishing Electric and Gas Rate Plans (Jan. 22, 2026).

<sup>3</sup> Cases 25-E-0072 & 25-G-0073, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric and Gas Service*, Joint Proposal at 68 (Nov. 5, 2025) [hereinafter Joint Proposal].

submitted within 30 days of the session.<sup>4</sup> The Company is expected to file a Final Heat Pump Operating Economics Customer Engagement Plan (“Final Plan”) by July 21, 2026.

The overarching goal of the outreach efforts outlined herein is to help customers use all of the tools at their disposal to save on energy bills. The strategies that the Company committed to in the Joint Proposal and have outlined in the Draft Plan aim to inform customers of their home equipment and rate options so that they can make the best decision for their household's energy needs. Currently, Con Edison automatically puts residential electric customers on a default rate: SC 1 Rate I. The Company offers several alternative rate options that may result in lower annual energy costs for customers with distinctive load profiles: SC 1 Rate III and Rate IV. To realize the benefits of the alternative rates, customers must proactively opt-in to SC 1 Rate III or IV. This customer-driven action requires individuals to 1) know that alternative pricing options are available, 2) believe that they will save money by switching to an alternative rate, 3) understand how to opt-in to the alternative rate, and 4) in some instances, understand how their energy-consumption patterns will impact their savings and change their behavior accordingly.

Because of these barriers, opt-in rates typically have much lower levels of participation and reduce the impact of the advanced rate options.<sup>5</sup> Alternatively, Con Edison could comprehensively assess residential customers' load profiles and automatically enroll those that would save on one of the alternative rates into that customer class. This would improve bill savings for customers and make customer outreach and education much simpler—the Company would just need to explain the rates customers are on, rather than being responsible for convincing those with saving potential to proactively switch rates. In the absence of an automatic enrollment policy, however, the development and implementation of a robust Customer Engagement Plan is critical to ensure that customers understand and access the best rate options.

The Draft Plan is a step in the right direction but falls short in several key areas. First, the Draft Plan is a high-level document that lacks detail on the implementation of the ideas it promotes. The Final Plan should elaborate on the concrete steps the Company will take for each strategy promoted in the Plan and commit to an implementation timeframe for each initiative. Further, there are several key improvements that the Commenters urge the Company to incorporate in the Final Plan, which include better utilizing the Company's existing and in-development customer engagement tools, expanding the categories of targeted customer segments, improving communication to customers who do not save on the alternative rate in the first year, strengthening engagement with Clean Heat contractors, offering varied communication channels that align with customer preferences, and clarifying the process for verifying heat pump installations.

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<sup>4</sup> *Id.* at 69; Cases 25-E-0072 & 25-G-0073, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric and Gas Service*, Heat Pump Engagement Plan Stakeholder Webinar Notice (May 6, 2025).

<sup>5</sup> NORTHEAST ENERGY EFFICIENCY PARTNERSHIP, *Modern Rate Design in the Northeast: Unlocking Efficiency, Affordability, and Electrification* at 39 (Dec. 17, 2025), <https://neep.org/modern-rate-design-northeast-unlocking-efficiency-affordability-and-electrification>.

## 1. The Company Should Utilize Existing and Planned Programs to Enhance its Outreach and Data Collection

**CARE Program.** The Company has an existing program—the Customer Analytics, Reporting, and Engagement (“CARE”) program<sup>6</sup>—that comprises a portfolio of projects with the stated purpose of “enhanc[ing] the customer digital experience and encourag[ing] participation in the Companies’ and State’s clean energy programs.”<sup>7</sup> The Draft Plan states that the company will utilize CARE to “coordinate across the Company on outreach and communications” and “work across the Company to support responses to customer inquiries,” but does not provide further detail.<sup>8</sup> The Company should more fulsomely integrate CARE product functionality into the implementation and timeline of its Final Plan—including personalized rate comparisons, personalized rate eligibility information, simulations of bill impacts from DER upgrades (e.g., heat pumps, solar, electric vehicles), Customer Service Representative (“CSR”) rate comparison tools, and any other applicable CARE products.

One program in the CARE portfolio is a “Rate Product Tool,” which is meant to “guide residential customers through their rate options, provide personalized rate comparisons using historic [advanced metering infrastructure (“AMI”)] usage data, and provide customers with projected bill impacts with the installation of clean energy technologies[.]”<sup>9</sup> The Joint Proposal states that the Customer Engagement Plan will “incorporate the Rate Products Tools and Clean Energy Experience Tools.”<sup>10</sup> Though the Rate Product Tool has been in development for years, the Company has yet to launch a comprehensive tool that can deliver benefits to ratepayers.<sup>11</sup> Providing personalized comparisons of the bill impacts of each rate is fundamental to educate customers on their energy pricing and equipment options. Personalized analysis can give a customer confidence that switching rates is the right choice for their home and energy needs. The company should commit to a schedule by which to develop and launch the Rate Product Tool in the Final Plan.

Contact with CSRs is an important way that customers seek information from their utility, and the Joint Proposal states that the Customer Engagement Plan will include “materials and guidance to help stakeholders access tools and resources.”<sup>12</sup> But the Draft Plan does not explain the role of CSRs. Thus, the Final Plan should also clarify how the Company’s CSRs will utilize the Rate Product Tool to provide personalized rate advice to customers. For example, CSRs should be trained to respond to calls about high bills, where appropriate, by 1) running a rate comparison report for a customer to determine if there is a lower cost rate available for that customer based on their historical usage date and 2) advising customers on behavioral changes

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<sup>6</sup> Formerly Customer Recommendation and Analysis Tools.

<sup>7</sup> Cases 25-E-0072 & 25-G-0073, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric and Gas Service*, Q1 2026 CARE Progress Report, at 2 (May 29, 2026) [hereinafter Q1 2026 CARE Report].

<sup>8</sup> Draft Plan at 6.

<sup>9</sup> Q1 2026 CARE Report at 3.

<sup>10</sup> Joint Proposal at 68.

<sup>11</sup> Cases 25-E-0072 & 25-G-0073, *Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric and Gas Service*, Direct Testimony of the Information Technology Panel, Exhibit \_\_ (IT-5) at 60 (Jan. 31, 2025); *see also* Q1 2026 CARE Report at 16.

<sup>12</sup> Joint Proposal at 68.

they can make to reduce their bill under current or prospective enrolled rates. The Company's Q1 2026 CARE Quarterly Report identifies that "Rate Product [Customer Service] View Enhancements" will not be built until 2028.<sup>13</sup> The Company should prioritize the actions above on a faster timeline to ensure that customers are getting actionable information from CSRs.

***New York State Clean Heat Program.*** The Draft Plan states that the Company is "committed to advancing energy efficiency and building electrification" through the New York State Clean Heat ("Clean Heat") program's heat pump rebate, which incentivizes heat pump installation in residential homes through rebates.<sup>14</sup> The Draft Plan also discusses integrating rate information into its Clean Heat marketing materials. However, the Final Plan should go further in leveraging its direct access to heat pump adopters through this existing program.

The Company should modify the Clean Heat rebate application to collect all information necessary to obtain customer consent and facilitate contemporaneous enrollment in applicable heat pump-friendly rates via the rebate application. At a minimum, the rebate application should include clear disclosures regarding available heat pump rates, an explanation of potential bill savings, and a customer authorization mechanism that allows the Company to enroll eligible customers directly upon rebate approval. The Clean Heat rebate application represents a valuable customer touchpoint and provides an opportunity to connect customers with rates and programs, including the price guarantee program, that can improve heat pump operating economics immediately upon installation. Allowing customers to enroll in optional rates like SC1 Rate IV directly through the Clean Heat rebate application reduces rate enrollment friction for both customers and the Company and is likely to increase rate enrollment.

This approach has already been adopted by other utilities seeking to address persistently low enrollment in heat pump-beneficial rates. For example, the Minnesota Public Utilities Commission recently directed Xcel Energy to update its heat pump rebate application and installation process to enroll eligible customers in its electric space-heating rate, including by adding language to the heat pump rebate application that authorizes enrollment.<sup>15</sup> Similar modifications here would substantially reduce customer friction, increase participation in SC1 Rate IV, and help ensure that customers installing heat pumps receive the rate design benefits intended to support beneficial electrification. If a customer does not sign up for the optional rate through the rebate application, Con Edison should follow up by email or postal mail with information about the rate and its potential benefits. Where sufficient historical load profile data is available, the company should provide a personalized rate comparison showing estimated bill impacts under the optional rate, including a simulated load profile reflecting heat pump adoption.

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<sup>13</sup> Q1 2026 CARE Report at 28.

<sup>14</sup> Draft Plan at 2.

<sup>15</sup> Minnesota Public Utilities Commission, Docket No. E-002/M-23-524, *In the Matter of the Petition of Xcel Energy for Approval of a Residential Time of Use Rate Design Order Approving Tariff Modifications, Approving Compliance Plan, and Setting Additional Requirements for Residential Time-of-Use Rate Implementation* (Feb. 23, 2026), <https://efiling.web.commerce.state.mn.us/documents/%7BB08F8C9C-0000-C51F-922A-F890505D7614%7D/download?contentSequence=0&rowIndex=13>.

## 2. The Company Should Expand the Customer Segments Targeted for Focused Outreach to Include Electric Resistance, LMI, and New Customers

The Draft Plan segments customers into three categories and outlines tailored outreach strategies—which is a worthwhile approach. The three categories include: 1) customers considering heat pumps, 2) customers who recently installed heat pumps, and 3) customers who installed a heat pump over a year ago. In light of new analysis showing that alternative rates can deliver cost savings for additional groups of customers, the Final Plan should expand the targeted customer segments to include electric resistance heating customers, new customers (including prior customers moving residences and new accounts), and low- and middle-income (“LMI”) and disadvantaged customers.

New analysis demonstrates that electric resistance heating customers have high savings potential from switching to alternative rates such as SC 1 Rate IV, as these customers overpay by \$873 per year on average on default electric rates.<sup>16</sup> Electric resistance customers are overrepresented by low-income households, multi-family buildings, and renters,<sup>17</sup> three groups that each face additional barriers to heat pump adoption due to economic circumstances or lack of agency around household equipment installations. The company should develop a strategy for targeted outreach to these customers who may save on an alternative rate, even without installing a heat pump. The outreach should include tips for energy-saving behaviors that can positively impact electric bills.

In its Final Plan, Con Edison should incorporate outreach pathways targeting customers who are initiating or transferring electric service to households where heat pumps or electric resistance heating systems are already installed as the primary source of space heating. Customers initiating or transferring electric service must complete an Application for Service Use, which currently asks the customer to indicate whether they have “permanently installed electric space heating.”<sup>18</sup> First, if it is not already doing so, the Company should leverage this existing information to target outreach to customers initiating or transferring electric service at electrically heated homes about beneficial rate options, including SC1 Rate IV.

Furthermore, the Company should consider modifying the service application form to ask customers to optionally self-attest to the specific type of heating equipment instead—such as an air-source heat pump, ground-source heat pump, or electric resistance system—and whether the electric heat is the primary heating source for the premises. If the customer self-attests that they

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<sup>16</sup> S. Zuo et al., *Heat Pump Rates in New York State*, Switchbox (Apr. 28, 2026), <https://www.switch.box/nyhprates>.

<sup>17</sup> Low-income households are 34 percent more likely to rely on electric resistant heating than non-low-income households; multifamily households are 339 percent more likely to rely on electric resistance heating than single family households; and renters are 167 percent more likely to rely on electric resistance heating than homeowners. Case 24-E-0165, *Proceeding on Motion of the Commission Regarding Grid of the Future*, Petition of Environmental Defense Fund, Alliance for a Green Economy, Building Decarbonization Coalition, Earthjustice, New Yorkers for Clean Power, Rewiring America, and Sierra Club to Advance Rate Design Supportive of Affordable Beneficial Electrification at 17-18 (May 5, 2026).

<sup>18</sup> Con Edison, *Application for Service Use*, <https://cdnc-dcxprod2-sitecore.azureedge.net/-/media/files/coned/documents/small-medium-large-businesses/application-for-service.pdf?rev=7b326b639f8d4addafb85180b3c2ffdd&hash=A16D0A11D3C0CF731345C811F7DDBB5C> (last accessed June 15, 2026).

have electric heat as their primary heating source, the Company should conduct personalized outreach—including bill comparisons—to the new customer to inform them of their electric heating-friendly rate options. Further, if the customer self-attests that they have an air-source or ground-source heat pump as their primary heat source and elects to join SC1 Rate III or IV, the Company should also enroll them in the price guarantee program. In the absence of automatic enrollment, the company should conduct direct, personalized outreach to these new customers about their alternative pricing options.

The Final Plan should also include targeted customer education and marketing strategies for LMI and disadvantaged customers in homes with heat pumps or electric resistance heating. These customers are often more vulnerable to bill increases and may face additional barriers to participating in optional rate offerings. Accordingly, Con Edison should provide clear, accessible, and personalized information on potential bill impacts and savings opportunities, while coordinating rate education with existing low-income assistance and energy affordability programs and outreach efforts to help ensure that the benefits of optional rates reach these customer populations.

In summary, in addition to the customer segments identified in the Draft Plan, the Final Plan should directly address customer marketing and rate education efforts for (1) customers with electric resistance heating, (2) customers initiating or transferring electric service, and (3) LMI and disadvantaged customers. These customer groups may have substantial opportunities to benefit from optional rate offerings, but may require targeted outreach, education, and enrollment pathways to realize those benefits.

### **3. The Company Should Develop Robust Evaluation and Education Protocols for SC1 Rate IV Non-Savers**

The Draft Plan does not adequately address customer outreach and protections for customers who do not save from switching to an optional rate, nor does it sufficiently educate customers about the seasonal bill impacts associated with these rates. The Company's evaluation of SC1 Rate IV found that while most heat pump customers save money relative to SC1 Rate I, a meaningful minority of customers pay more on an annual basis ("non-savers"). Specifically, the share of non-savers ranges from 11.1% of customers with ground-source heat pumps and 19.1% of customers with air-source heat pumps.<sup>19</sup> In addition, the Draft Plan acknowledges that customers may experience higher bills during summer and shoulder seasons. However, the Draft Plan only briefly discusses communication plans for non-savers after the expiration of the initial 12-month price guarantee period.<sup>20</sup>

The Final Plan should:

- Describe how the Company will identify and engage customers who are not on track to save under SC1 Rate IV before the end of the 12-month guarantee period.

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<sup>19</sup> Case 22-E-0064, *Proceeding on the Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service*, SC 1 Rate IV Assessment: Bill Impacts and Potential Improvements at 4 (Dec. 30, 2023).

<sup>20</sup> Draft Plan at 3.

- Propose “rate-aware” high bill alerts and proactive outreach with rate-specific energy savings tips to customers whose usage patterns suggest they may not benefit from the rate.
- Explain how the Company will support customers whose 12-month bill guarantee period expires and who receive a bill credit.
- Detail an automatic off-ramp for persistent SC1 Rate IV non-savers, particularly low-income customers, rather than requiring them to take proactive action to unenroll from the rate.
- Require clearer customer communication about seasonal bill impacts, including:
  - Higher summer bills may occur;
  - Annual savings are realized primarily through lower winter bills;
  - Customers should understand savings on an annual rather than monthly basis.
  - Include in rate education materials discussion of Budget Billing options for customers concerned about seasonal bill variation.

#### **4. The Company Should Strengthen Engagement with Clean Heat Participating Contractors**

Pursuant to the Joint Proposal, the Company’s Customer Engagement Plan must include “educational initiatives for contractors and industry stakeholders.”<sup>21</sup> The Draft Plan discusses how the Company will engage with Clean Heat contractors, with a goal “to position customers’ awareness of the rate as a benefit to contractors when they are selling projects,” and briefly mentions engaging with other stakeholders including “manufacturers.”<sup>22</sup> While the Company’s proposed engagement with contractors in the Draft Plan is useful, Commenters identify several areas where deeper engagement could yield further benefits.

Con Edison should leverage Clean Heat installation contractors (“Participating Contractors”) as a primary customer engagement and rate enrollment channel. The Company should clarify whether Participating Contractors will have access to CARE rate product functionality and whether they will be able to generate customer-specific bill impact estimates for prospective Clean Heat participants. If not, Participating Contractors should be able to access CARE rate products via customer-authorized data sharing tools, such as Green Button Connect My Data.<sup>23</sup> Contractor access to personalized, unbiased heat pump operating cost estimates from Con Edison will help customers understand the long-term benefits of electrification under eligible rate options.

In addition, Con Edison should expand the role of Participating Contractors beyond rate awareness to include rate enrollment support. Contractors should be trained in eligibility requirements and enrollment procedures for SC1 Rate IV and future heat pump-friendly modifications to SC1 Rate III. Con Edison should provide contractors with standardized enrollment materials and customer-facing scripts to facilitate enrollment at the point of installation. This process can be streamlined through modifications of the Clean Heat rebate application that allows direct enrollment into heat pump-friendly rates, as described in Part 1 of these comments. These measures would reduce friction, improve heat pump customer

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<sup>21</sup> Joint Proposal at 68.

<sup>22</sup> Draft Plan at 5-6.

<sup>23</sup> GREEN BUTTON DATA, <https://www.greenbuttondata.org/cmd.html> (last accessed June 18, 2026).

participation in beneficial rates, and reflect the reality that contractors are often the primary point of contact for customers considering investments in heat pumps and other clean energy technologies.

Finally, if the Company feels strongly that Clean Heat contractors are not capable of performing this level of customer education and outreach, the Company should clearly state that view in its Final Plan, provide justification for that position, and identify alternate customer outreach pathways that will be proactively implemented at the time of heat pump installation. For example, the Company could support separate third-party outreach by rate experts to communicate directly with customers about personalized bill comparisons, eligibility, and enrollment procedures.

### **5. The Company Should Align Communication Channels with Customer Preferences**

The Draft Plan does not specify the method of communication for the initiatives outlined therein. All major customer communications should be available via the customers' preferred outbound communication channel, whether that be email or postal mail, and the Final Plan should clarify that major customer communications will be available through either method. The postal mail option is particularly relevant to customers who are less comfortable with digital communications, including some low-income and senior customers, as well as customers for whom the Company does not have a valid email address on file. The Final Plan should also consider customer communications through additional outbound channels (e.g., SMS/text messaging and mobile application push notifications, bill inserts) and inbound channels (e.g., customer portal, mobile app, and call centers).

Providing a variety of outbound and inbound communication channels is consistent with the Company's commitments in the Joint Proposal. Specifically, the Company committed to providing proactive rate comparison reports and making customer insights "available to customers in a variety of outbound channels (e.g., email, and postal mail) and inbound channels (e.g., customer portal and mobile app)."<sup>24</sup> The Final Plan should align with this commitment by clearly identifying the communication channels that will be used throughout the customer journey and ensuring that customers can receive information through the channels that are most accessible and effective for them.

### **6. The Company Should Clarify Requirements for Heat Pump Installation Verification**

The Draft Plan repeatedly references verifying heat pump installation prior to enrollment in the price guarantee program.<sup>25</sup> The Final Plan should describe what verification requirements apply to enrollment, why they are necessary, and whether they create barriers to customer participation. To the extent verification is required, the Company should seek to minimize customer burden by leveraging existing program participation data, rebate applications, contractor-submitted information, start/transfer service applications, and other readily available sources of information before requiring additional customer action.

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<sup>24</sup> Joint Proposal at 68.

<sup>25</sup> See Draft Plan at 3, 4, and 7.

## 7. The Company Should Enhance its Approach to Rate Comparison Reports

The Joint Proposal requires the Company to “provide proactive rate comparison reports, at a minimum of once per year, to residential customers that have adopted heat pumps, EVs and other priority DERs through a Company program.”<sup>26</sup> The Draft Plan states:

“In February 2026, the Company sent personalized emails to customers who would have saved on the Steady Use Rate over the previous year, including exactly how much they would have saved. The Company will continue to send similar emails to those customers at least once a year for the rest of the rate period.”<sup>27</sup>

The Commenters appreciate the Company’s initiative in sending the February 2026 rate comparison emails. However, the initiative appears to be limited to heat pump customers with at least one year of post-installation billing history and whose historical usage indicates they would have saved on SC1 Rate IV. The Draft Plan does not discuss how annual rate comparison reports will be provided to customers who installed heat pumps less than 12 months ago, customers without a full year of billing history, customers who are projected non-savers, or customers already enrolled in an optional rate. Further, the Draft Plan does not fulfill the commitment in the Joint Proposal to include EV customers and customers with other priority DERs in these outreach efforts.

The Final Plan should clearly describe how the Company intends to fulfill the Joint Proposal commitment, including the content, delivery timing, delivery channels, and target recipients of rate comparison reports.

At a minimum, annual rate comparison reports should:

- Be provided to customers with heat pumps, EV, and other priority DERs, regardless of whether historical usage data indicates that the customer is projected to save or not save on an alternative rate.
- Be provided to customers regardless of their currently enrolled rate and compare all eligible rate options available to the customer.
- Be offered through both email and postal mail channels.
- Include personalized bill comparisons, explanations of potential savings opportunities, and information about rate-specific behavioral and device-enabled strategies that may help customers reduce energy costs.
- Be available to customers with less than one year of post-installation billing history using reasonable estimation methodologies or residential average savings estimates where retrospective bill comparisons are not yet possible.

Finally, the Final Plan should identify which EV customers will receive annual rate comparison reports, define the technologies included within the term “other priority DERs,” and clarify that customers with those technologies will also receive annual rate comparison reports.

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<sup>26</sup> Joint Proposal at 68.

<sup>27</sup> Draft Plan at 6.

Respectfully submitted,

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