

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Proceeding on Motion of the Commission to Consider a
Clean Energy Fund**

Case 14-M-0094

**The Natural Resources Defense Council, Pace Energy and Climate Center, WE ACT for
Environmental Justice, the Association for Energy Affordability, the Center for Working
Families, Enterprise Community Partners, and the Green & Healthy Homes Initiative
Filing Jointly as “Energy Efficiency for All”**

Dated: August 14, 2015

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Comments to New York State Energy Research and Development Authority

Clean Energy Fund Information Supplement

Case 14-M-0094

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I. Introduction

The Natural Resources Defense Council (“NRDC”), Pace Energy and Climate Center, WE ACT For Environmental Justice, the Association for Energy Affordability, the Center for Working Families, Enterprise Community Partners, and the Green & Healthy Homes Initiative, here filing jointly as “Energy Efficiency for All,” are pleased to present these comments (“Comments”) to the New York Public Service Commission (“Commission”) on the New York State Energy Research and Development Authority (“NYSERDA”) “*Clean Energy Fund Information Supplement*” filed on June 25, 2015 (“Supplement”) in Case 14-M-0094, Proceeding on Motion of the Commission to Consider a Clean Energy Fund (“CEF”).

Energy Efficiency for All is a coalition that advocates for energy efficiency and complimentary renewables in affordable multifamily housing and a just and inclusive clean energy transition for all New Yorkers, including low income, green workforce, and environmental justice concerns.¹

Energy Efficiency for All supports the range of different tools NYSERDA proposes to use to achieve energy efficiency savings throughout its portfolio, although we seek more detail about specific program changes that are under consideration for the multifamily portfolio. The magnitude of the task at hand requires innovative thinking, new ideas, and targeting sectors with vast energy savings potential.

¹ Energy Efficiency for All previously commented on the “*NYSERDA 2015 Reallocation Supplement to the CEF*” issued Nov. 18, 2015 in the CEF on Dec. 8, 2015 (initial comments) and Dec. 22, 2014 (reply comments) and has also engaged in related proceedings, including but not limited to the “Reforming the Energy Vision” (“REV”) proceeding.

Further, we note that based on the benefit estimates of the portfolios included in CEF, reaching New York’s energy efficiency target is likely to require significantly higher levels of public investment than are currently being considered. Therefore, we urge the Commission to establish the size of the CEF based on the resources needed to achieve the state energy efficiency goal. Further, as discussed in the Supplement, low to moderate income (“LMI”) New Yorkers make up 40 percent of the state’s residents. Many of these residents reside in affordable multifamily buildings (both subsidized and unsubsidized). As NYSERDA is to remain an important provider of LMI programs and supports, it is important that the CEF commit ongoing funds in proportion to the need for the affordable multifamily sector.

Specifically, in these Comments, Energy Efficiency for All urges the Commission to: (1) ensure that adequate budgets are developed for energy efficiency in affordable housing; (2) provide more detail on the nature and scope of LMI programs; (3) strengthen the Supplement’s goals with regards to LMI environmental health and workforce development; and (4) establish plans, with funds set aside, to support interagency coordination. We also urge NYSERDA to develop a definition of energy efficiency that avoids the unintended consequence of increased fossil emissions in the NYSERDA Proposed CEF Eligibility Rules filed on July 31, 2015 (“NYSERDA CEF Rules”).²

II. Goals (Supplement at 4)

Energy Efficiency for All supports the ambitious public policy goals established in the Final New York State Energy Plan (“SEP”), including the aggressive 600 trillion Btu statewide

² Pursuant to the Commission “Notice Modifying Comment Categories” dated August 9, 2015 in Case 14-M-0094.

energy efficiency savings target. We also agree with the Supplement where it states that the CEF “must be considered in the context of New York’s long term energy policy and goals” and also must be closely coordinated with REV.³

a. Modify CEF Output Metrics

Energy Efficiency for All recommends modifying the output metrics that will track the contribution of the CEF toward the SEP energy and environmental goals, to better track LMI efforts, environmental health, and workforce development outcomes. The Supplement proposes that NYSERDA track the contribution of the CEF toward the SEP energy and environmental goals using the following metrics:

- Total greenhouse gas (“GHG”) emissions reductions, as measured in tons of CO₂e reduced;
- Affordability, as measured by reductions in customer energy bills;
- Statewide penetration and scale of energy efficiency and clean energy, measured by the total increase in energy efficiency savings and renewable energy generation (MW, MWh, and MMBTU); and
- Growth in the State’s clean energy economy, as measured by total public and private investment in clean energy technologies and solutions.

First, Energy Efficiency for All supports the inclusion of language that includes the need for NYSERDA to achieve LMI outcomes, ultimately including those in affordable multifamily

³ These goals include: (1) the reduction of GHG emissions by 40% from 1990 levels, (2) renewable energy providing 50% of electricity generated for consumption, and (3) 600 TBtu of increased energy efficiency throughout the State’s economy, all by 2030. *See* the Supplement at p. 42.

housing. As discussed further in section II.b below, Energy Efficiency for All supports NYSERDA's, and the CEF's, role in the LMI sector. This includes NYSERDA's request for \$235 million in funds for LMI market development activity over three years (2016-2018).⁴ NYSERDA and the Commission have noted that the CEF will have a special role to play in LMI, particularly where there may be a lack of, or the need to develop, independent commercial interest.⁵ The Supplement and the REV Staff White Paper both note, in particular, the robust potential for energy efficiency savings in affordable multifamily housing, in addition to the challenges of achieving it.⁶

Second, Energy Efficiency for All underscores the importance of REV achieving positive environmental justice outcomes, as described in the SEP.⁷ This is also acknowledged by the REV Staff White Paper, which states that the Commission is "highly sensitive to the concerns of the environmental justice communities that they not experience increases in local fossil-fuel emissions due to higher levels of DER penetration. Accordingly, the programs that are discussed herein should be used as a vehicle to decrease harmful local emissions for the benefit of the specific EJ communities and their neighbors."⁸ Thus, NYSERDA's long-term goals for the CEF should include goals that reflect reductions in particulate matter (PM) and other co-pollutants and related positive public health outcomes. Possible comparative metrics for such outcomes can include reductions in asthma episodes, asthma related ER visits and hospitalizations, household

⁴ We note that we have some concerns about a lack of specificity in the Supplement regarding LMI market development, specifically what kind of investment plans will be requested.

⁵ See the "*Staff White Paper on Ratemaking and Utility Business Models*," issued Jul. 28, 2015 in case 14-M-0101 at 45 ("REV Staff White Paper").

⁶ See Supplement at 211-16 and REV Staff White Paper at 45-47.

⁷ SEP at 39-44.

⁸ REV Staff White Paper at 45.

injuries, etc. Given the importance of reducing emissions, including particulate matter, for EJ communities, the broader public, and the environment, we also have concerns about NYSERDA's proposed eligibility criteria (see section VI below).⁹

Third, market and economic development should, critically, include workforce development and job creation outcomes.

Thus, Energy Efficiency for All asks the Commission and NYSERDA to make the following changes (in black and underlined) to the metrics of the CEF:

- Total GHG emissions reductions, as measured in tons of CO₂e reduced, **as well as particulate matter and other co-pollutant reductions and related improvements in public health outcomes, as measured by techniques currently used by the Department of Environmental Conservation and the Environmental Protection Agency;**
- Affordability **and reductions in energy poverty**, as measured by reductions in customer energy bills;
- Statewide penetration and scale of energy efficiency and clean energy, measured by the total increase in energy efficiency savings and renewable energy generation (MW, MWh, and MMBTU); **and**
- Growth in the State's clean energy economy, as measured by total public and private investment in clean energy technologies and solutions, **including LMI market**

⁹ See the "NYSERDA CEF Eligibility Criteria Letter," issued July 31, 2015, in case 14-M-0094 ("Eligibility Letter").

development, and workforce development advancements, as measured by public and private jobs created in the State.

We ask the Commission to require that the factors of PM and co-pollutants, public health, LMI market development, and job creation be closely tracked as metrics of success for the CEF.

b. Seize Untapped Energy Savings Potential in the Affordable Multifamily Sector

Energy Efficiency for All wishes to continue to bring attention to the unmet needs of the affordable multifamily building segment. This market segment is largely subsumed within the LMI market segment identified by NYSERDA. Based on Census data we estimate that there are approximately 1.7M units of affordable multifamily housing in New York, representing over 60% of all multifamily dwellings in the state.^{10,11}

As iterated by both NYSERDA and the REV Staff White Paper,¹² the multifamily sector contains significant potential for energy efficiency savings that can generate billions of dollars in net benefits. This is further demonstrated in the 2015 Optimal Study, discussed further below and attached hereto as Annex A. We urge NYSERDA to commit to achieving these savings, and creating the funding and targets necessary to do so.

The two recent Optimal Studies completed for Energy Efficiency for All have characterized in varying degrees of detail the savings opportunities that reside within New

¹⁰See “Potential for Energy Savings in Multifamily Housing,” prepared for Energy Efficiency for All and issued by Optimal Energy, May 2015 (“2015 Optimal Study”) at p. 64.

¹¹See “Potential for Energy Savings in Multifamily Housing,” prepared for Energy Efficiency for All and issued by Optimal Energy, October 2014 (“2014 Optimal Study”) at p. 4.

¹² See *Supra* note 3.

York's multifamily and affordable multifamily market segments. The 2014 Optimal Study examined achievable savings potential in all multifamily dwellings in New York. This study estimated that over a 10 – 20 year timeframe that 27% of electricity usage and 25% of gas usage could be saved through reasonably aggressive program efforts.¹³ This study used a variety of secondary studies, including a previous New York statewide potential study completed by Optimal Energy, to inform its estimate of multifamily savings.¹⁴ An interesting finding of the study was that the combined 2012 and 2013 program efforts of NYSERDA and the state's investor-owned utilities saved less than 2% of the identified multifamily electricity savings opportunity. Clearly, there is a large unmet need to serve this economically vulnerable market segment.

More recently Optimal Energy completed a more detailed nine-state study focusing on the affordable multifamily segment. Optimal analyzed 182 discrete measures and for the nine states modeled more than 13,000 distinct combinations of measure, market, building size, and utility service territory for each year of the analysis. For New York the study estimated that the cumulative 20 year (2015-2034) achievable potential is:

- 24% of electricity usage, or 1,981 MWh
- 13% of gas usage, or 8,019 BBtu
- 15% of fuel oil usage, or 5,258 BBtu

¹³ 2014 Optimal Study at p. 8.

¹⁴ Optimal Energy. Energy Efficiency and Renewable Energy Potential Study of New York. Prepared for NYSERDA. 2014. <https://www.nyserd.ny.gov/Energy-Data-and-Prices-Planning-and-Policy/Energy-Prices-Data-and-Reports/EA-Reports-and-Studies/EERE-Potential-Studies.aspx>

This level of savings would require an investment of approximately \$2.2 billion and generate benefits of \$5.3 billion and net benefits of \$3.1 billion.¹⁵

Achieving these benefits in the affordable multifamily sector can go a long way towards fulfilling the State’s energy goals, as well as creating healthier communities. Energy Efficiency for All commends NYSERDA’s proposal of market transformation initiatives and other supports for the multifamily sector, which we hope will impact the LMI sector as well as the market rate sector. We want to emphasize, however, that robust incentives will also be needed for the affordable multifamily sector as it will need assistance in order to respond to the transforming marketplace.

III. Market Development Initiatives and Evolution of Previously Authorized Programs; Low to Moderate Income (Supplement at 6.6)

a. NYSERDA’s Supplement Proposals are On the Right Track

Energy Efficiency for All agrees that New York cannot attain its clean energy goals unless it enhances “access to and uptake of renewable and energy efficiency solutions for LMI households and communities.”¹⁶ We are pleased to enthusiastically support many of the policy prescriptions that NYSERDA proposes in the Supplement. First, we fully support the continuation and expansion of affordable multifamily programs that are currently performing well.¹⁷ Second, Energy Efficiency for All believes that the proposals submitted by NYSERDA

¹⁵ 2015 Optimal Study at p. 8.

¹⁶ Supplement at 81.

¹⁷ NYSERDA staff confirmed in the CEF webinar Q&A that the Affordable Multifamily Performance Program will continue and is referred to in the text but not by name. However, this important program should be identified by

with regard to financial supports, increased coordination, tool and resource development, pilots, demand aggregation, strengthening clean energy partners, and LMI solar will make New York the nation's leader in clean energy outcomes for LMI customers. We also appreciate the research NYSERDA plans to engage in with regards to environmental justice concerns, including generation hot spots, co-pollutants and air quality.¹⁸ These types of efforts are exactly what is needed in order to overcome the barriers to energy efficiency and complimentary renewables in cities and affordable buildings. As discussed below, however, we would like to see more detail on the size, scope and budgets that are being made available for these efforts.

b. More Detail From NYSERDA is Needed on Affordable Multifamily Programs and Budgets

Energy Efficiency for All asks that NYSERDA provide more detail as to the nature and intended scope of these programs, particularly in the areas of affordable multifamily housing, workforce development programs and increased interagency coordination. As discussed more below, we also request that NYSERDA, with appropriate stakeholders, develop a plan and a budget for how this interagency coordination will be structured and implemented.

While we support the approaches outlined in the Supplement, NYSERDA proposes annual Investment Plans with three-year rolling budgets, which appears to allow for changes to programs and funding levels, including elimination, with little notice.¹⁹ NYSERDA is well aware of the detrimental effect of uncertainty on developing markets and program providers. We

name (as MPP is in the general Multifamily section) and, most importantly, it was left out of the table in “Appendix G: Summary of Market Development Initiatives, Transitions and Timing” (p.229).

¹⁸ Supplement at 133.

¹⁹ Supplement at 191.

therefore suggest that NYSERDA’s understandable need for flexibility to adjust to market developments (or lack thereof) be balanced more appropriately with providing some program certainty. This is especially important given NYSERDA appears to be requesting the ability to move funds among programs within portfolios as well as between portfolios. In addition, despite several extensions of time for filing the Supplement, NYSERDA has left details of programs, funding and metrics to the proposed Investment Plan. We believe that document should be made available for stakeholder input prior to adoption.

c. Fuel Neutrality

Energy Efficiency for All supports the “fuel blind” approach to efficiency program efforts proposed for both NYSERDA and the utilities as proposed in the CEF.²⁰ As noted, 35% of industrial energy consumption and 34 percent of household heating consumption is derived from sources other than electricity and natural gas. This consumption is responsible for 21% of residential GHG emissions, 18% of commercial emissions, and 43% of industrial emissions.²¹

To achieve aggressive energy and GHG reductions as well as to address energy security issues of the affordable multifamily market segment will require NYSERDA and others to pursue a coordinated and inclusive multi-fuel strategy. However, the Supplement gives no guidance as to how NYSERDA, the utilities and others should prioritize their investment in different fuels. Further, from a project perspective comprehensive treatment of all cost-effective opportunities, regardless of fuel type, should always be high priority. We ask that NYSERDA

²⁰ Supplement at 198.

²¹ Supplement at 196.

clarify how they will balance this priority against any fuel-specific objectives, priorities, or funding constraints.

d. Evaluation

NYSERDA is proposing a shift in evaluation, measurement and verification activities to more current and forward looking market assessment activities. These would often be undertaken at the sector or portfolio level and would provide high-level market assessments or indicators of market progress relative to the metrics described above. While Energy Efficiency for All supports such market characterization and assessment efforts, we believe that more traditional process and impact evaluation activities are still warranted, particularly in those market segments where the majority of funding will come from NYSERDA, the utilities, and other federal, state, and local authorities. These evaluation activities will continue to bring value to improve program performance as well as to ensure that anticipated program savings are delivered to all participants.

NYSERDA also proposes the use of a Test-Measure-Adjust approach to both pilots and to more established initiatives. However, such activities appear to be more focused on markets and market barriers than on the technologies and practices they support.²² NYSERDA does note the continued need for field verification work. However, it states that:

Historically, significant resources have been spent on field verification for incentive programs. Given the nature of the CEF initiatives, NYSERDA envisions field verification to remain an important area of work, but to be less resource intensive than in the past.²³

²² Supplement at 149

²³ Supplement at 152

We request that NYSERDA exercise caution in de-emphasizing more “traditional” engineering impact related work. We cite by way of example a recently completed impact evaluation in Massachusetts of its residential gas HVAC program.²⁴ On-site metering and subsequent follow-up study revealed that upwards of one half or more of all installed high efficiency boilers were not properly condensing. As a result, these boilers were losing a third or more of the expected efficiency improvement and associated savings. In response to these findings, the Massachusetts program administrators are planning to make significant changes to their program. Market characterization or assessment studies of the general type proposed by NYSERDA would not have revealed this type of critical program finding.

IV. Workforce Development

Energy Efficiency for All commends NYSERDA on their past work in this area, particularly under the Green Jobs Green New York (“GJGNY”) Program. NYSERDA has shown a commitment to innovating and engaging communities in job creation and workforce development. In particular we would like to highlight the successful On the Job Training (“OJT”) program, Workforce Training for Energy Efficiency funding, and GJGNY Community based aggregation programs as models for helping to build career entry and advancement opportunities statewide.

It is critical that LMI customers statewide are able to participate in emerging and developing REV and CEF business and market opportunities. This includes participating in CEF and REV programs and markets, investing in DER, and engaging in programs that create local

²⁴ High Efficiency Heating Equipment Impact Evaluation Final Report. March 2015. Prepared for The Electric and Gas Program Administrators of Massachusetts. <http://ma-eeac.org/wordpress/wp-content/uploads/High-Efficiency-Heating-Equipment-Impact-Evaluation-Final-Report.pdf>

and community value (that may be partnerships with the public or private sector). It also, critically, includes opportunities for business creation and entrepreneurship in markets for DER. Further, NYSERDA will need community partners in order to deepen DER penetration in the LMI market segment. This presents job opportunities for youth and other residents to engage with clean energy, work with early adopters, and spread DER across the distribution system platform to be created by REV.

In order for NYSERDA to build upon their successful efforts in this area in recent years we ask that NYSERDA:

- Develop specific goals and metrics for workforce and economic development including job training and creation in disadvantaged communities, environmental justice communities, rural communities, and for women and people of color;
- Identify specific opportunities to work with community partners to ensure that residents of all communities have access to CEF and REV workforce opportunities in their community, as they have under GJGNY aggregation;
- Identify opportunities for low-income affordable housing residents to be employed on CEF projects in their community;
- Identify opportunities for LMI customers to engage in DER ownership, and CEF and REV related entrepreneurship; and
- Expand its collaboration with NY State Department of Labor and community stakeholders to ensure that career pathways are available all New Yorkers, including workers with barriers to employment.

NYSERDA should also ensure that jobs created by the CEF are “good jobs” that pay a living wage and provide benefits. As an initial step NYSERDA should work in collaboration with New York State Department of Labor to collect data on the clean energy and energy efficiency workforce and convene stakeholders to develop guidelines and goals for data collection and setting metrics.

V. Interagency Coordination

Energy Efficiency for All commends NYSERDA and the Supplement’s intention to increase interagency coordination, particularly in the buildings sector. Overcoming barriers to energy efficiency in affordable multifamily housing, and achieving the commensurate health, antipoverty, and other benefits, can best be done when NYSERDA works with stakeholders like New York States Homes and Community Renewal (HCR) and the NYC Department of Housing Preservation and Development, who also work extensively with affordable multifamily owners, managers, financiers, and tenants.

Energy Efficiency for All, however, asks that NYSERDA build in a structure, and budget, for this interagency coordination. We ask that NYSERDA be required to develop a plan for this coordination, with agencies like HCR, the Office of Temporary and Disability Assistance, Housing Preservation and Development, and other stakeholders. Such coordination will only be feasible with all parties contributing time and resources. Thus, NYSERDA should set aside a pool of funding to support this coordination and any inter-agency initiatives that may be necessary to implement it.

As one example, HCR is currently partnered with NRDC on a pilot project to benchmark the properties in the Mitchell Lama portfolio.²⁵ NRDC's preliminary analysis of 23 properties in the downstate region has identified \$6.4 million dollars in potential utility cost savings.²⁶ In order for these savings to be realized, however, HCR will need to continue to benchmark results and conduct outreach, education and engagement with owners. HCR will then need to plug into NYSERDA and utility programs, and collaborate with other stakeholders, to ease barriers and ensure smooth implementation at scale. Ideally, HCR, working with NYSERDA and others, will build the capacity to identify and realize the savings beyond this pilot and capture the data and savings from its entire portfolio of buildings. This is a challenge, as it takes considerable time and resources to engage with building owners and their portfolios. In addition, HCR, and other agencies, will need assistance as they build new tools, resources, and guides, like information for a One Stop Shop as proposed by the Supplement, into their current programs and internal processes, and train their staff to help with CEF initiatives. Energy Efficiency for All asks that the Supplement and NYSERDA set aside some funds to support interagency coordination.

VI. Comments on the NYSERDA CEF Rules

Energy Efficiency for All would also like to take this opportunity to provide input on the NYSERDA CEF Rules. The importance of reducing emissions, including particulate matter, for EJ communities, the broader public, and the environment necessitates clear parameters for technologies eligible for state-funded programs. NYSERDA's definition of energy efficiency in the proposed eligibility criteria includes end-use efficiency, avoided generation or fuel

²⁵ Preliminary results on file with NRDC.

²⁶ *Id.*

combustion due to on-site energy options, and strategies to improve overall system efficiency and reliability.²⁷ The latter two criteria could, without modification, result in increased emissions in local communities and also to increased use of fossil fuel in large, central generation if transmission to facilitate it resulted in overall system efficiency. We suggest the criteria be changed to ensure only clean, preferably renewable, generation can be used to qualify for system efficiency increases and that provisions be made to restrict increased emissions from distributed generation.

VII. Conclusion

Energy Efficiency for All commends NYSERDA for the forward thinking and necessary steps the Supplement takes to support the LMI sector. We ask that NYSERDA adjust the CEF's overarching goals to reflect NYSERDA's ongoing responsibility to meet the needs of LMI customers across the state, including health, workforce, and community development.

Supplement budgets should also include more detail, and be sufficiently large, to take advantage of the untapped potential of energy efficiency in affordable multifamily buildings.

Acknowledging that interagency coordination is the best way to facilitate efficiency savings in the affordable multifamily sector, we ask that NYSERDA plan and budget for collaborative efforts. Finally, we ask for a definition of energy efficiency that promotes clean and renewable power and restricts emissions from distributed generation in the NYSERDA CEF Rules. Thank you.

Respectfully submitted:

[Signatures to Follow]

²⁷ Eligibility Letter at 3.

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