



December 22, 2014

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

RE: Scaling Up Energy Efficiency in Affordable Housing for the Energy Security, Health and Wealth of Low Income New Yorkers

Dear Governor Cuomo:

The Natural Resources Defense Council, Pace Energy and Climate Center, Enterprise Community Partners, the Green & Healthy Homes Initiative, the Association for Energy Affordability, and WE ACT for Environmental Justice (together, “Energy Efficiency for All”) thank you in advance for your attention to this matter. We also would appreciate the opportunity to meet with you and your staff to further discuss these issues.

The Energy Efficiency for All coalition members have been pleased to participate in your administration’s current efforts to encourage energy efficiency and clean distributed energy resources. We thank you for your leadership and your administration’s willingness to tackle the difficult task of “reforming” our energy delivery system to be more environmentally sensitive, more efficient and more participatory.

Energy Efficiency for All believes state-supported energy efficiency efforts are critical for low income families and our ability to maintain a stock of affordable, healthy, safe, and energy efficient homes for all New Yorkers. In keeping with the movement to a new energy vision, we urge you to embrace goals and budgets for energy efficiency in multifamily housing that will make New York the national leader in this sector. Specifically, as stated in our comments to the New York Public Service Commission in the Reforming the Energy Vision proceeding, **New York should adopt a multifamily sector goal of reaching 1.5% per year electric savings and 1.0% per year in gas savings between 2016 and 2020.**¹ To achieve these energy savings goals and ensure equitable use of scarce resources, State and utility energy efficiency programs should contain explicit requirements for

¹ See New York State Multifamily Efficiency Opportunities, Optimal Energy for Energy Efficiency For All, October, 2014 (“*Optimal Energy 2014 New York Multifamily Potential Study*”), Case 14-M-0101, Reply Comments of The Center for Working Families, WE ACT for Environmental Justice, Enterprise Community Partners, and the Green and Healthy Homes Initiative, October 24, 2014, Attachment A at 10.

participation and funding for multifamily buildings that house lower income populations.

Energy efficiency and other distributed energy resources that tap into the potential of affordable² multifamily buildings will create healthier, cleaner, and more prosperous and sustainable cities. Investing in greener and healthier homes both protects New York from the carbon pollution that harms our health and our planet, and benefits households struggling to pay energy bills.

The energy efficiency market is composed of different segments, each with unique barriers and opportunities that must be identified, including the needs of the multifamily sector. Split incentives, thin capitalization and few programs tailored to affordable multifamily properties are a non-exclusive list of barriers the sector faces. On the other hand, savings to be gained from energy efficiency in multifamily housing can pave the way for New York City and New York State's affordable housing and energy agendas while promoting positive health and economic benefits. Successful development and implementation of the state's new vision for the energy landscape necessitates equitable inclusion of all consumers. This requires the monetization and more holistic inclusion of social values, like health, resilience, climate mitigation, energy security, and economic benefits in program design and delivery.³

We can see firsthand just how dramatically lives are changed for the better when families don't have to cope with asthma attacks or discomfort caused by housing in serious disrepair. Children enjoy better health and safety, and everyone in the neighborhood benefits. According to evidence released in national studies conducted by Oakridge National Labs and Green & Healthy Homes among others, investments in energy efficiency in low income housing have been shown to reduce hospitalizations and emergency department visits related to asthma, improve neighborhood stabilization, and improve school attendance.

Further, as detailed in the *Optimal Energy October 2014 New York Multifamily Potential Study*, the multifamily affordable housing stock in New York presents a massive untapped opportunity for capturing cost-effective energy efficiency. "Roughly speaking ... multifamily buildings represent approximately 9% of the identified achievable electric potential, 24% of the natural gas potential, and 22% of the petroleum fuels potential."⁴ Energy Efficiency For All requests that you ramp up the state's support for energy efficiency investments in this sector.⁵

² "Affordable" as used here encompasses both housing that is affordable because of subsidies/contracts and housing that is affordable because of market conditions.

³ As discussed in Case 14-M-0101, Comments of The Center for Working Families, WE ACT for Environmental Justice, Enterprise Community Partners, and the Green and Healthy Homes Initiative for Energy Efficiency for All, September 22, 2014.

⁴ Optimal Energy 2014 New York Multifamily Potential Study at 7.

⁵ We envision programs and commitments that expand on/are additional to existing budgets for low income populations at NYSERDA, NYSHCR and ODTA.

In order to do so, New York should embrace a goal of incorporating energy efficiency retrofits in all affordable multifamily housing preservation and development efforts. As we stated in our comments in the REV, in order to put New York on a trajectory to make progress on the multifamily housing sector's achievable potential and to show national leadership, New York should make a goal of reaching 1.5% per year electric savings and 1.0% per year gas savings in this sector between 2016 and 2020,⁶ which would require a yearly investment on the order of \$215 to \$430 million per year.⁷

We appreciatively note that you made tremendous investments in improving energy efficiency in Buffalo as Attorney General and understand how energy efficiency can create healthy and safe housing. As former Secretary of the Department of Housing and Urban Development, you are uniquely qualified to be a leader on this issue. We request an opportunity to meet with you or your key staff to discuss this matter. We will follow up shortly to arrange this discussion.

Thank you.

Sincerely,

[Signatures to follow]

CC: Jim Malatras
Richard Kauffman
Audrey Zibelman
John Rhodes
Darryl Towns

⁶ Optimal Energy New York Multifamily Potential Study at 10.

⁷ *Id.*

Natural Resources Defense Council

Jackson Morris

Director, Eastern Energy
(570) 380-9474

jmorris@nrdc.org

Raya Salter

Senior Utility Advocate
(212) 727-4661

rsalter@nrdc.org

40 W. 20th Street
New York, NY 10011

Pace Energy and Climate Center

David Gahl

Director of Strategic Engagement
(518) 487-1744

dgahl@law.pace.edu

John Bowie

Energy and Climate Law Advisor
(914) 422-4126

jbowie@law.pace.edu

78 North Broadway
White Plains, NY 10603

Enterprise Community Partners, Inc.

Kendra Pierre-Louis

Program Officer, Green Communities

kpierrelouis@enterprisecommunity.org

Yianice Hernandez

Director, Green Communities

yhernandez@enterprisecommunity.org

1 Whitehall Street, 11th Floor

New York, NY 10004

(212) 262-9575

Green & Healthy Homes Initiative

Ruth Ann Norton

President/CEO

(410) 534-6477

ranorton@ghhi.org

726 Exchange Street, Suite 525
Buffalo, NY 14210

Association for Energy Affordability, Inc.

Valerie Strauss

Director of Policy & Regulatory
Affairs

vstrauss@aea.us.org

David Hepinstall

Executive Director

hepinstall@aea.us.org

105 Bruckner Boulevard

Bronx, NY 10454

718.292.673

WE ACT for Environmental Justice

Peggy Shepard

Executive Director

peggy@weact.org

Cecil Corbin-Mark

Deputy Director/Director of Policy
Initiatives

cecil@weact.org

1854 Amsterdam Avenue

New York, NY 10031

(212) 961-1000