



For Immediate Release
April 20, 2018

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NYPIRG Responds to Governor Cuomo's Energy Efficiency Announcement

Over 100 Groups Called On Governor to be a National Environmental Leader on Efficiency

This past Wednesday, over 100 groups issued a letter to Governor Cuomo, urging him to make New York the nation's leader in energy efficiency in his Earth Day announcement.¹ The groups called for NY's new efficiency measures to match, if not surpass, California and Massachusetts. Massachusetts is a national leader. California recently passed legislation to double their efficiency standards, with a goal of 4% energy savings.²

Today's announcement by Governor Cuomo identifies the real work that the state has cut out for it. We applaud the governor's announcement and New York State must match its words with its deeds.

The American Council for an Energy-Efficient Economy ranks states on their energy efficiency efforts. In 2011, New York was ranked 3rd in the nation, in 2017, it had dropped to 7th.³ New York must regain its status near the top of the nation. NYPIRG welcomes the governor's initiative and looks forward to the details to make that rhetoric a reality.

¹ Letter to Governor Cuomo: https://www.nypirg.org/pubs/201804/Earth_Day_10_Steps_EE_release_final_with_letter.pdf

² http://assembly.state.ny.us/leg/?default_fld=&leg_video=&bn=A09841&term=2017&Summary=Y&Memo=Y&Text=Y, Sec. 2, para. 5; see also <http://www.kw-engineering.com/double-energy-efficiency-by-2030/>

³ National energy efficiency rankings: for 2017, <http://aceee.org/sites/default/files/pdf/state-sheet/2017/new-york.pdf>; for 2011, see pages iv and v, aceee.org/sites/default/files/publications/researchreports/e115.pdf; for current rankings on all states, go to <http://aceee.org/state-policy/scorecard> and click on map.

BY HAND

April 18, 2018

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

Dear Governor Cuomo:

We are pleased that you will be making an Earth Day announcement as to what steps New York will take on energy efficiency by 2025.

We urge you to commit New York to be the nation's leader on energy efficiency. Over the last seven years New York's ranking has slipped from number 3 to number 7. Neighboring Massachusetts is now the national leader in energy efficiency, though California recently passed legislation to double their efficiency standards, with a goal of 4% energy savings New York should match if not surpass California and Massachusetts.

The most critical action is to mandate energy efficiency savings for individual utilities, which would ramp up over time. It is important that New York adopt clear, short-time timelines (e.g., annual) and benchmarks to guide our progress in meeting such goals.

Utilities need to play a leading role in buying energy saving programs and products. They must be required to embrace the goals of the state's Reform Energy Vision (REV) program, including supporting the development of renewable distributed energy resources (DER) (i.e., not natural gas).

The state should set aside 40% of energy efficiency investments for climate vulnerable and frontline communities, partnering with those communities in executing energy efficiency initiatives. Additionally, it is critical these targets prioritize equity by incorporating inclusive financing mandates for utilities, prevent rate increases for low- and moderate-income ratepayers, provide good-paying jobs, integrate public accountability measures, address the needs of multi-family housing, incentivize comprehensive in-unit improvements, and preserve housing affordability.

Methane is 80 times more potent short term as a greenhouse gas than carbon. Thus it is critical that our energy efficiency goals do not support the use of natural gas. The Governor's energy efficiency plan must seriously address heating but should do so by rejecting natural gas in favor of clean renewable energy such as geothermal and heat pumps. While the plan should set aggressive targets for fossil fuel use reductions, efficiency savings must not be achieved (or counted towards goals) by creating incentives for or promoting the conversion of heating oil furnaces to gas fired, or replacing less efficient gas furnaces to more efficient gas furnaces.

The Efficiency Initiative should grow additional opportunities for energy efficiency businesses in New York that currently employ 110,000 New Yorkers. Embracing the creation of sustainable financing mechanisms, the state should monetize the benefits of efficiency; compensate providers for those benefits; and, create a competitive procurement to get the most value for customers.

It should support Pay for Performance, an energy efficiency procurement approach which allows energy efficiency companies to compete for contracts that specify how much energy is expected to be saved, and then pays the price offered by the bidders for energy savings as they occur.

State energy building codes should be updated to require new buildings to have net zero carbon emissions. A mandatory program should be initiated requiring existing buildings to do cost-effective energy building retrofits. Incentives to heat buildings with clean, renewable energy (geothermal, air heat pumps) should be increased and expanded. Existing energy retrofit programs (e.g., Green Jobs Green NY) should be reformed to achieve their stated goals.

The efficiency standards should reflect the goal of moving to 100% clean energy as soon as possible (i.e., much faster than the state's present goals). It needs to recognize that moving to 100% clean energy will involve electrifying energy uses that cannot otherwise be eliminated (e.g., electric cars and heating), which will likely increase overall electricity production especially in the near term (e.g., beneficial electrification). It should provide maximum credit for additional efficiency gained via beneficial electrification through heat pumps and electric vehicles.

We urge you to take bold action to make New York the national leader on energy efficiency.

Signed,

350NYC	New York City
Advocates for Springfield	Springfield Center
Alliance of New York Family Councils	New York
Aytzim: Ecological Judaism	New York
Bethlehem NY Indivisible	Delmar
Big Reuse	Brooklyn
Bronx Climate Justice North	Bronx
Brooklyn For Peace	Brooklyn
Campaign for Renewable Energy	Ithaca
Carbon Tax Center	New York
Carbon Xprint LLC	New York
Catskill Mountainkeeper	Livingston Manor
Central Park West CSA	New York
Church Women United in New York State	Rochester
Citizens Committee for New York City	New York
Citizens' Environmental Coalition	Cuddebackville
Citizens For Water	New York City
Coalition Against Nukes	Wainscott
Coalition to Protect New York	Elmira
Community Advocates for Sustainable Energy CASE	Canaan
CUNY Divest	New York City
Damascus Citizens for Sustainability	Narrowsburg
Daughters of Wisdom US Province	Ozone Park

Delmar Farmers' Market	Delmar
Democracy for New York City	Brooklyn
Dēmos	New York City
Dominican Sisters of Blauvelt	New Rochelle
Dryden Resource Awareness Coalition	Dryden
Earth Eden Sanctuary	North Rose
Eco-Logic, WBAI-FM	New York City
EldersClimateAction	Cohoes
Empire State Consumer Project, Inc.	Rochester
Empire State Indivisible	New York City
Environmental Justice Task Force of the WNY Peace Center	Buffalo
First Reformed Church of Schenectady	Schenectady
Food & Water Watch	Brooklyn
Fossil Free Tompkins	Brooktondale
Franciscan Sisters of the Atonement	Garrison
Full Potential Consulting	Lansing
Gas Free Seneca	Watkins Glen
Greater New York Labor Religion Coalition	New York
Green Education and Legal Fund	Poestenkill
Greene Rural Action Bloc	Athens
Greyrock Farm CSA LLC	Cazenovia
Hazon	New York
HealthyPlanet	Huntington
Hunger Action Network of NYS	Albany
Indian Point Safe Energy Coalition	Cortlandt Manor
Interfaith Peace Network	Buffalo
Long Beach Environmental Advisory Board	Long Beach
Mamaki	New Rochelle

Manhattan Central Medical Society, local affiliate of the National Medical Association	New York
Metro NY Catholic Climate Movement	New York City
National Jobs for All Coalition	Lynbrook
New Economy Project	New York
New York Heartwoods	Kingston
New York Lawyers for the Public Interest	New York
New York Progressive Action Network Enviro Committee	Athens
North American Climate, Conservation and Environment (NACCE)	Roosevelt
Nuclear Age Peace Foundation	New York
NW Bronx Indivisible	Bronx
NY Buddhist Climate Action Network	New York
NY Statewide Senior Action Council	Albany
NYC Friends of Clearwater	NYC
NYC Grassroots Alliance	New York
NYC H2O	New York City
NYC Safe Energy Campaign	New York City
NYH2O	New York City
NYPIRG	New York
Pathway to Paris	New York
People for a Healthy Environment	Corning
People of Albany United for Safe Energy	Albany
People's Climate Movement	Albany
Plymouth Friends for Clean Water	South Plymouth
Rochester Pachamama Alliance	Rochester
Rochester People's Climate Coalition	Rochester
Save the Pine Bush	Albany
Sealed	New York

Serpentine Art and Nature Commons, Inc.	Staten Island
Sharon Springs Against Hydrofracking	Sharon Springs
Sierra Club Brooklyn	Brooklyn
Sierra Club Niagara	Buffalo
Sisters of St. Dominic of Blauvelt, New York	Blauvelt
Sludge Stoppers Task Force	Long Beach
Solarize Albany	Bethlehem
Solidarity Committee of te Capital District	Albany
Solstice	Homer
South Asian Fund for Education, Scholarship and Training (SAFEST)	Jamaica
Stone Quarry House	Ithaca
Stop NY Fracked Gas Pipeline	Canaan
Stop the Algonquin Pipeline Expansion (SAPE)	North Salem
Surfrider Foundation NYC	New York
Surfrider Foundation, Eastern Long Island Chapter	East Hampton
Sustainable Tompkins	Ithaca
The YEARS Project	New York City
Tompkins County Climate Protection Initiative	Ithaca
Unitarian Universalist Congregation of the Catskills	Kingston
United for Action	Brooklyn
Upper Green Side.	New York
Weather Medic Inc.	North Tonawanda
WESPAC Foundation, Inc.	White Plains
Western New York Environmental Alliance	Buffalo
Western NY Drilling Defense	Buffalo
Western NY Peace Center, Inc.	Buffalo
WNY Peace Center, Environmental Justice Task Force	Buffalo
Women's Caucus for Art	New York City

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