

September 8, 2021

Patrick Woodcock, Commissioner, Department of Energy Resources

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Dear Commissioner Woodcock and members of the Energy Efficiency Advisory Council,

I am writing to express my strong recommendation that the EEAC request the PA's to deliver a significantly more in-depth and more highly funded set of Deep Energy Retrofit programs than what is currently presented in the Draft 3-Year Plan. Performing energy retrofits on existing buildings is critical to meeting the Clean Energy and Climate Plan (CECP). However, if these are not done correctly, at a deep level, the retrofits will not achieve the deep energy savings that are required to meet the state's carbon emission reduction goals.

We need two very ambitious retrofit programs, as follows:

- 1) A program focused on the deepest possible retrofits – using the Passive House standard for retrofits. This needs to be funded at *a minimum of \$35,000/unit*, as the property owners will need to be heavily incented to take on the cost of truly deep energy retrofits at the level prescribed to meet Passive House standards. NYSERDA has been successful using this level of \$ incentive and we should use their program as a guide.
- 2) Some additional specifics need to be added to the program envisioned to install air source heat pumps (ASHPs). Evidence shows us that without doing a deep energy retrofit – improving the building envelope (including air sealing) – the heat pumps alone will not achieve the required reduction in energy use, and might in fact add to a tenant's electricity bills. Therefore, the ASHP program needs to be designed in conjunction with the requirement to complete a building envelope upgrade. The elements of the envelope upgrade need to be defined, but should include insulation, air sealing, siding, and roof upgrades. This program should be funded with *a minimum of \$15,000/unit* for the building envelope, *in addition to* the amount required to incent the installation of heat pumps.

Meeting the goals of the 2030 CECP will be extremely challenging. We need to request the PAs to embrace much deeper and better funded retrofit programs if we are to have any hope of meeting these highly ambitious but critical goals.

Sincerely,

Betsy Harper

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