



**February 7, 2011 - *Via electronic mail***

New York State Climate Action Council  
Climate Action Plan  
NYSERDA  
17 Columbia Circle  
Albany, NY 12203-6399

Dear Members of the New York State Climate Action Council:

Northeast Energy Efficiency Partnerships (NEEP) would like to thank the New York State Climate Action Council for its extensive work on the Interim Climate Action Plan. The Council's work will play an important role in defining the policies and programs that will be necessary to meet the state's long term goal of reducing greenhouse gas emission to 80 percent below 1990 levels by 2050. We encourage you to continue the Climate Action Plan process in order to ensure that New York remains a national leader on the issues of climate change and energy efficiency.

The interim Climate Action Plan wisely focuses on the central role of building energy efficiency in meeting New York's climate goals, as buildings are responsible for over half of statewide greenhouse gas emissions. The measures recommended in Chapter 6 on the residential, commercial and industrial building sector will help New Yorkers simultaneously reduce greenhouse gas emissions, lower building operating costs and improve occupant comfort. This plan, combined with the policy recommendations within the 2009 New York State Energy Plan, demonstrates a consensus for continuing the state's ambitious energy savings goals, which can generate positive economic benefits while curbing greenhouse gas emissions.

We would like to highlight a few recommendations for the final Climate Action Plan:

**Building Energy Codes:** Achieving full compliance with the state building code and allowing cities and towns to adopt an optional "stretch" code is a proven way to reduce energy use in new buildings and promote new energy savings technologies. NEEP recommends supporting the Department of State in more quickly adopting new versions of the model International Energy Conservation Code (IECC) and providing the necessary resources to fully enforce those codes in communities throughout the state.

**Building Energy Benchmarking and Disclosure:** Requiring large commercial and industrial building owners to disclose their energy use and providing an easy-to-understand rating is an important step towards fully valuing energy and carbon savings in the market. NEEP also recommends studying the impact of mandatory energy performance disclosure at the time of listing/sale in residential buildings, which would make it easier for consumers to value energy efficiency as part of their home buying and renting decisions.

**Heating Fuel Efficiency Programs:** We strong believe that full access to energy efficiency and weatherization programs should be made available to homes and businesses that heat with oil, propane, and other fuels. NEEP looks forward to working with stakeholders in New York to emulate current efforts on this front in Maine and Massachusetts.

**Efficiency and Clean Energy Fund and Program Administration:** New York has done an admirable job of ramping up its investments in energy efficiency in recent years, but the report rightly notes the need to consolidate the many funding streams currently dedicated to energy efficiency. Improved coordination of



System Benefits Charge (SBC), Energy Efficiency Portfolio Standard (EEPS), Regional Greenhouse Gas Initiative (RGGI), and other energy efficiency funding would allow New York to more effectively leverage public dollars. The proposed Coordinating Council must serve to bring together key stakeholders, including representatives from state government, the utilities, and the business and environmental communities to promote consensus on energy efficiency and clean energy policy, as well as foster greater flexibility and faster implementation of customer efficiency programs.

**Cost/Benefit Assumptions:** While we applaud the interim report's extensive work on the cost and savings of the policies recommended, we encourage the final report to fully account for the co-benefits associated with energy efficiency measures. This will provide a fuller picture of the total economic benefits that will result from them.

Thank you again for the strong work you have done on the interim Climate Action Plan. NEEP looks forward to working with you as you seek to advance the energy savings policies laid forth in the plan.

Best regards,

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Northeast Energy Efficiency Partnerships (NEEP)