



Energy Efficiency in Naturally Occurring Affordable Multifamily Housing

Barriers and Opportunities in the Northeast and Mid-Atlantic
Northeast Energy Efficiency Partnerships



JULY 2026



Table of Contents

Executive Summary	2
Methodology and Scope	4
Introduction and Significance of Multifamily Housing in the Northeast and Mid-Atlantic.....	4
Variability in Multifamily Building Stock and Repercussions for Program Eligibility	5
NOAH Multifamily Rental Properties as a Distinct Housing Sector	6
Regional Landscape and Physical Characteristics	7
The Expense of Retrofitting Older Multifamily Buildings	8
Why NOAH Properties Are Hard for Programs to Serve.....	10
Programmatic Barriers	10
Program and Project Complexity.....	11
Financing NOAH Multifamily Energy Retrofits	11
Property Owners: Awareness, Trust, and Capacity.....	12
Split Incentives and Affordability.....	13
Tenants: Engagement and Communication	14
Regional Program Models That Meet the Challenges of NOAH Multifamily Properties.....	14
Regional Case Studies: Emerging Models for Serving NOAH Multifamily Properties	15
Case Study 1: Affordable Multifamily Energy Efficiency Program (AMEEP) New York City.....	15
Case Study 2: Connecticut: Coordinating Multiple State Tools for NOAH Properties Bridgeport, CT.....	20
Case Study 3: Low-Income Energy Affordability Network (LEAN) Multifamily I Boston, MA	24
Case Study 4: MEEHA as a Multifamily Retrofit and Affordability Platform Maryland	28
Lessons From Regional Programs: Case Study Synthesis and Best Practices.....	32
Retrofit Program Recommendations for State and Utility Multifamily Administrators.....	33
Conclusion.....	35

Acknowledgments

Northeast Energy Efficiency Partnerships thanks our partners at Action for Boston Community Development, Con Edison, the Connecticut Department of Energy and Environmental Protection, Enterprise Green Communities, Eversource Energy, the Maryland Energy Administration, the Massachusetts Department of Energy Resources, the New York State Energy Research and Development Authority, and New Ecology, Inc. for their generous contributions to and support of this work.

About NEEP

NEEP was founded in 1996 as a non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate regional collaboration to promote advanced energy efficiency and related solutions in home, buildings, industry, and communities. Our vision is that the region's homes, buildings, and communities are transformed into efficient, affordable, low-carbon, resilient places to live, work, and play.

Disclaimer: NEEP verified the data used for this brief to the best of our ability. This paper reflects the opinion and judgments of the NEEP staff and does not necessarily reflect those of NEEP Board members, NEEP Sponsors, or project participants and funders. .

©Northeast Energy Efficiency Partnerships, Inc. 2026



Executive Summary

Naturally occurring affordable housing (NOAH) is privately owned rental housing that offers relatively lower rents but does not participate in a federal, state, or local housing subsidy program. These lower rents are often tied to building age, location, physical condition, and deferred capital needs. Across the Northeast and Mid-Atlantic, this housing stock is an important source of lower-cost rental housing, particularly in older multifamily buildings in urban areas where housing affordability pressures are high.

For state and utility energy efficiency programs, driving uptake at NOAH multifamily properties has historically been difficult. Comprehensive retrofits in these buildings are expensive and often require owners to navigate major project complexity, limited access to capital, thin operating margins, deferred maintenance, and tenant-related concerns such as disruption, cost shifting, and displacement risk. These factors make retrofits harder to plan, underwrite, finance, and implement in NOAH properties than in owner-occupied housing or subsidized affordable housing with clearer financing and compliance structures.

This paper examines how statewide energy efficiency and housing retrofit programs in New York, Connecticut, Massachusetts, and Maryland are adapting to low-income multifamily rental properties in markets with significant NOAH stock. The analysis uses a qualitative case study approach that draws on program documents, regulatory filings, evaluation materials, and interviews with state and utility program administrators. Case studies illustrate how statewide programs operate in local housing markets with different building typologies, ownership structures, and affordability pressures.

While common barriers persist, the case studies show that regional programs are beginning to adapt to better serve the NOAH market. In New York, the Affordable Multifamily Energy Efficiency Program (AMEEP) illustrates how a statewide utility program can use a flexible affordability test, multiple project pathways, and staged incentives to make participation more feasible for unsubsidized properties. In Massachusetts, the Low-Income Energy Affordability Network (LEAN) multifamily model demonstrates the value of locally embedded implementation networks, strong program delivery support, and affordability protections tied to participation. In Connecticut, the state provides an example of coordinated governance across energy, housing, and finance agencies, along with stakeholder engagement intended to improve program design over time. Maryland Energy Efficiency and Housing Affordability (MEEHA) shows how grants, loans, and pre-weatherization support can be combined in a housing-focused platform that links energy upgrades with affordability preservation.

Results across these programs are still emerging. New York and Massachusetts provide the clearest early evidence of program implementation and outcomes, while Connecticut and Maryland are more useful at this stage for illustrating governance, financing, and program design approaches than for demonstrating mature savings or preservation data. This uneven evidence base reflects the fact that several of the featured programs are relatively new, recently expanded, or still refining their implementation pathways.

Several cross-cutting practices stand out across the case studies. These include streamlined eligibility pathways, end-to-end technical assistance, access to contractors or qualified energy professionals, flexible capital for audits and predevelopment work, funding for enabling repairs and electrical upgrades, and tenant



protections that help limit rent increases or other adverse outcomes after upgrades are complete. These practices are especially important in unsubsidized multifamily buildings where owners often lack the staffing, reserves, and financing tools needed to move a complex retrofit project forward.

For state policymakers, utilities, and multifamily program administrators, the central lesson is that NOAH properties should be treated as a distinct affordable housing segment within energy efficiency and electrification portfolios. Programs that reduce administrative burden, allow practical eligibility pathways, coordinate with housing and finance partners, and align retrofit incentives with tenant protections are better positioned to serve older unsubsidized multifamily properties. Scaling these efforts will require not only stronger program design, but also better data collection, more coordinated financing, and clearer accountability for affordability and tenant outcomes over time.

Key Takeaways

- NOAH multifamily properties are a major share of lower-cost rental housing in many regional cities, especially in older buildings in urban cores with high affordability pressures.
- Conventional multifamily program rules, eligibility criteria, and documentation requirements often steer participation toward subsidized affordable properties and leave NOAH properties harder to reach.
- The featured state programs in New York, Massachusetts, Connecticut, and Maryland show that streamlined eligibility, end-to-end technical assistance, flexible capital, and tenant protections can make participation more feasible for unsubsidized multifamily owners.
- Evidence of program results is strongest in New York and Massachusetts, while Connecticut and Maryland currently provide more insight into governance, coordination, and financing models than into mature savings and preservation outcomes.
- Program reporting often does not clearly distinguish NOAH properties from subsidized affordable and market-rate multifamily buildings, which limits the ability to assess whether NOAH properties are being reached at scale or receiving a meaningful share of program dollars.
- Treating NOAH properties as a distinct segment within energy efficiency and electrification portfolios can help align program design, financing, and tenant protections with the conditions of this part of the housing market.



Methodology and Scope

This paper uses a qualitative case study approach to examine how statewide energy efficiency and housing retrofit programs are adapting to reach naturally occurring affordable multifamily properties. The analysis draws on program documents, regulatory filings, evaluation materials, and interviews and feedback from state and utility program administrators in New York, Connecticut, Massachusetts, and Maryland. These four states were selected because they represent the variety of program models in the Northeast and Mid-Atlantic and include large urban markets where NOAH properties are prevalent. The city examples in this paper are illustrative of statewide programs and are used to show how those programs operate in widely different local housing markets with unique building typologies, ownership structures, and affordability pressures. Several of the featured programs are relatively new, recently expanded, or still developing relevant implementation pathways. As a result, evidence on realized savings, tenant impacts, and long-term preservation outcomes is stronger in some case studies than in others, and findings should be understood as a mix of documented results and emerging lessons to inform multifamily energy efficiency and electrification program design.

Introduction and Significance of Multifamily Housing in the Northeast and Mid-Atlantic

Multifamily housing in the Northeast and Mid-Atlantic represents both a significant opportunity and a complex challenge for advancing regional energy efficiency. Over the past three decades, the sector has been increasingly recognized as a crucial resource for a range of community needs. Multifamily housing often clusters in areas with better access to employment, shopping, health care providers, and public transportation, providing access to low-barrier housing for new renters, essential workers, working families, seniors, individuals with disabilities, and new Americans. With its relatively low cost and proximity to jobs, services, and amenities, multifamily housing serves as a critical anchor to community stability across the region.

Federal, state, and local energy agencies, utility planners, and energy efficiency researchers and advocates working in the region have shared this heightened focus on multifamily housing for several reasons. The sheer number of residential buildings alone, particularly in the region's dense urban cores, makes the sector a key consideration for program administrators. New York City has roughly 2.7 million apartments in buildings with three or more units, with approximately 829,000 in buildings with more than 100 units.¹ In New York state, 52.8 percent of residential units are in multifamily buildings. In Massachusetts, 42.8 percent of residential units are apartments, and in New Jersey, the figure is 37.5 percent.²

Due to the age of regional building stock, many of these apartments were built before modern building codes and standards, commonly featuring outdated wiring, deteriorating exteriors, old windows, poor insulation, and inefficient heating and cooling, hot water, lighting, and ventilation systems. While these conditions make

¹ New York State Energy Research and Development Authority. (2023). NYSEDA Residential Statewide Baseline Study. <https://it.nyserda.ny.gov/-/media/Project/Nyserda/Files/Publications/building-stock-potential-studies/residential-baseline-study/Vol-2-Multifamily-Res-Baseline.pdf>

² Jones, J. (2025). U.S. Cities Building the Most Multi-Family Housing. Construction Coverage. <https://constructioncoverage.com/research/cities-building-the-most-multi-family-housing>



multifamily retrofits complicated and expensive, the potential for energy savings also makes these buildings attractive targets for energy efficiency program administrators.³ In the early 2000s, state and utility programs began establishing dedicated multifamily programs to address these needs.⁴ Since that time, the trend toward dedicated multifamily programs has spread across the Northeast and Mid-Atlantic, with state and utility program administrators now operating dozens of multifamily programs in nearly every regional jurisdiction.⁵ These programs are typically segmented by income-qualifying criteria or unit count, which only begins to hint at the broad diversity that is inherent to the multifamily sector.

Variability in Multifamily Building Stock and Repercussions for Program Eligibility

Multifamily housing spans privately owned apartments, public housing, subsidized affordable housing, mixed-income properties, and mixed-use retail and residential buildings. Owners of these properties are similarly diverse, and include landlords with one building, small portfolio owners, professional property management firms, large institutional investors, resident cooperatives, local housing authorities, and non-profit organizations, among others. The buildings these owners manage vary in size and configuration and include everything from large homes that have been converted into apartments, to townhome-style communities, to low-, mid-, and high-rise buildings. In terms of energy efficiency programs, the number of units in the building is typically the metric used to differentiate single-family residential properties from commercial multifamily properties. The U.S. Department of Housing and Urban Development (HUD) defines a multifamily building as a residence with five or more units, a threshold which is widely used by multifamily programs across the region.⁶

Rental properties are typically described in two broad categories: market-rate and affordable. Market-rate apartment buildings are privately held and priced at owner discretion, with consideration for factors like area median rent

WHAT IS NOAH?

Naturally occurring affordable housing (NOAH) refers to rental properties that maintain affordable rents due to the age, location, and other characteristics of the property rather than by participating in a federally subsidized affordable housing program.

³ American Council for an Energy-Efficient Economy. (2020). Understanding Multifamily Home Energy Efficiency Potential. <https://www.aceee.org/sites/default/files/pdfs/Multifamily%20Home%20Energy%20Efficiency%20Potential%20final%201-22-21.pdf>; National Renewable Energy Laboratory. (2022). U.S. Building Stock Characterization Study: Reyna, J., et al. (2022). U.S. building stock characterization study: A national typology for decarbonizing U.S. buildings (Report No. NREL/TP-5500-83063). National Renewable Energy Laboratory. <https://docs.nrel.gov/docs/fy22osti/83063.pdf>; Munankarmi, P., Wilson, E. J. H., Reyna, J. L., Present, E., Rothgeb, S., & Satre-Meloy, A. (2023). Modeled Results of Energy Efficiency Measure Packages: Munankarmi, P., Wilson, E. J. H., Reyna, J. L., Present, E., Rothgeb, S., & Satre-Meloy, A. (2023). Modeled results of four residential energy efficiency measure packages for deriving advanced building construction research targets (Report No. NREL/TP-5500-81441). National Renewable Energy Laboratory. <https://docs.nrel.gov/docs/fy23osti/81441.pdf>

⁴ American Council for an Energy-Efficient Economy. (2013). Scaling Up Multifamily Energy Efficiency Programs: A Metropolitan Area Assessment (Research Report E135). <https://www.aceee.org/research-report/e135>

⁵ American Council for an Energy-Efficient Economy. (2025). 2025 State Energy Efficiency Scorecard (Research Report). https://www.aceee.org/sites/default/files/pdfs/the_2025_state_scorecard.pdf

⁶ U.S. Department of Housing and Urban Development. (2024). 24 C.F.R. § 290.3 Definitions (Multifamily project). Retrieved from <https://www.law.cornell.edu/cfr/text/24/290.3>



(AMR) and operating expenses. The term “affordable housing” is typically used to describe subsidized affordable apartments, where lower rents are determined by regulatory agreements and funded through federal rent subsidies. Most regional energy efficiency programs recognize this distinction and offer targeted programs that address the differing needs of subsidized affordable and market-rate properties. Yet many researchers and practitioners from a variety of disciplines, including energy efficiency, community development, housing advocacy, and economic justice, describe an additional rental property category that blends characteristics of both affordable and market-rate housing: naturally occurring affordable housing (NOAH).

NOAH Multifamily Rental Properties as a Distinct Housing Sector

NOAH multifamily is a term used to describe multifamily rental housing that offers lower rents than market-rate properties but does not participate in state or federal subsidy programs. Unlike subsidized affordable housing, NOAH properties feature comparatively lower rents than surrounding market-rate housing, often because they are older, underinvested, or operate outside formal affordability programs. This term encompasses a broad range of rental housing, as demonstrated by a recent study by DePaul University and the Preservation Compact, which identified six discrete typological clusters of NOAH properties.⁷

DePaul University / Preservation Compact: Six NOAH Market Typologies ⁸	Description
1. Very low-income urban core	Very low-income renters, older rental stock, and high-cost burdens in urban cores with concentrated poverty and histories of disinvestment
2. Prosperous urban core	Older rental housing in economically dynamic cores with new development, loss of lower-income renters, and displacement pressures as higher-income renters move in
3. Older suburban markets	Suburban areas with older rental stock, limited new construction, and rising demand from higher-income renters, creating growing affordability pressures
4. Growing affordable centers	Generally affordable rental markets that have seen recent growth in rental development but are experiencing rapidly deteriorating affordability
5. High-income suburbs	High-income suburban areas with relatively few rental options overall and very limited lower-cost or affordable rentals
6. Low-density fringe suburbs	Low-density suburban fringe areas with limited rental options but generally more affordable rents compared with higher-cost inner suburbs

⁷ The Preservation Compact. (2022). Breaking Up the NOAH Monolith. NOAH preservation research. <https://www.preservationcompact.org/noah-preservation-research-2/>

⁸ The Preservation Compact. (2022). Breaking Up the NOAH Monolith. NOAH preservation research. <https://www.preservationcompact.org/noah-preservation-research-2/>



For the purposes of this analysis, NOAH properties are defined as unsubsidized rental housing that is affordable to households earning at or below 80 percent of area median income (AMI) using the standard rent-as-30-percent-of-income affordability benchmark.⁹ Much of this affordable housing stock is concentrated in older multifamily buildings, particularly in the dense urban cores of cities in the Northeast and Mid-Atlantic, where multifamily buildings make up a disproportionately large share of residential housing.¹⁰

Regional Landscape and Physical Characteristics

Across the Northeast and Mid-Atlantic, unsubsidized affordable multifamily building stock is aging yet central to housing availability. In Bridgeport, Connecticut's most populous city, 63 percent of housing units are in multifamily buildings, and 40 percent of the housing stock was built before 1940. Many of these properties have outdated heating systems, windows with poor insulation value, and exterior building envelopes that are outdated and often suffer from deferred repairs and maintenance issues.¹¹ According to New York's statewide baseline multifamily study, roughly one-third of the state's multifamily buildings with five or more units were built prior to 1939.¹² In Providence, Rhode Island, more than half of all housing units are in properties with more than three units, and more than three quarters of the housing stock was constructed before 1970.¹³

Share of Residential Units in Older Housing Stock		
City	Housing Age Metric	Share of Housing Units
New York City	Share of homes built before 1940	42%
Boston	Share of homes built before 1940	52%
Bridgeport	Share of homes built before 1940	40%
Baltimore	Share of homes built before 1960	72%

In terms of physical characteristics, multifamily buildings vary widely across the region. In New York, multifamily properties average 230 units, often spread across several buildings. In Bridgeport, Connecticut, 34 percent of non-single-family home renters live in properties with two to four units, with 36 percent at properties with five to 49 units, and only 7 percent in buildings with 50 or more units.¹⁴

⁹ Making the Case for a Dedicated NOAH Strategy. (2018, June 24). Affordable Housing Finance. https://www.housingfinance.com/policy-legislation/making-the-case-for-a-dedicated-noah-strategy_o.

¹⁰ Emrath, P. (2024, October 30). Multifamily Housing: Distribution, Building Size, and Gross Rent Congressional Districts. National Association of Home Builders. <https://eyeonhousing.org/2024/10/multifamily-housing-distribution-building-size-and-gross-rent-across-congressional-districts/www>

¹¹ City of Bridgeport. (2023). City of Bridgeport Affordable Housing Plan. City of Bridgeport. https://www.bridgeportct.gov/sites/default/files/2023-12/Bridgeport_Affordable_Housing_Plan_Approved_10.16.2023.pdf

¹² New York State Energy Research and Development Authority. (2023). NYSEDA Residential Statewide Baseline Study. <https://it.nyserda.ny.gov/-/media/Project/Nyserda/Files/Publications/building-stock-potential-studies/residential-baseline-study/Vol-2-Multifamily-Res-Baseline.pdf>

¹³ U.S. Census Bureau. (2024). American Community Survey 2019–2023 5-Year Estimates, Table B25024: Units in structure; Table B25034: Year structure built; Providence city, Rhode Island. <https://data.census.gov>

¹⁴ New York State Energy Research and Development Authority. (2023). NYSEDA Residential Statewide Baseline Study. <https://it.nyserda.ny.gov/-/media/Project/Nyserda/Files/Publications/building-stock-potential-studies/residential-baseline-study/Vol-2-Multifamily-Res-Baseline.pdf>; City of Bridgeport. (2019). Plan Bridgeport: Bridgeport's Comprehensive Plan 2019-2029. <https://engage.bridgeportct.gov/plan-bridgeport/widgets/83921/documents>



From a building-system perspective, older multifamily buildings frequently feature centralized heating and hot water systems, while central air conditioning is less common. In New York, more than 70 percent of multifamily buildings have central space heating systems, and over 85 percent have centralized domestic hot water, yet only 5 percent have central air conditioning, indicating widespread dependence on window air conditioners or portable room units.¹⁵

Natural gas is the most common fuel source for heating in multifamily buildings in the Northeast, with 63 percent of five-plus-unit multifamily buildings using gas systems and 7 percent relying on delivered fuels.¹⁶ Gas and delivered fuel are particularly common in older multifamily buildings, as demonstrated in cities like Bridgeport, where most pre-1960 multifamily properties use gas or delivered fuel for space heating.¹⁷ Inefficient electric resistance heating is twice as common in multifamily buildings as other types of housing, persisting in many older low-rent properties where electric baseboard heaters and wall units contribute to high tenant energy burden.¹⁸

The Expense of Retrofitting Older Multifamily Buildings

Retrofitting these properties can be prohibitively expensive, as detailed in a recent Boston Housing Authority (BHA) analysis that evaluated retrofit costs across three common multifamily building typologies: garden-style, low-rise walk up buildings, and mid- to high-rise elevator buildings.¹⁹ The analysis estimated costs per unit for each type of building assuming a comprehensive project scope including envelope work, electrical system upgrades, space and water heating electrification, and appliance electrification.

BHA's portfolio primarily consists of buildings constructed between 1940 and 1959, a comparable vintage to many NOAH properties in the region's urban centers. Study results found that garden-style properties were projected to be the most capital-intensive projects due to a high facade-area-to-volume ratio (a measure of exterior building envelope per unit of interior space), and a tendency for leaky envelopes, resulting in an estimated price range of \$100,000 to \$140,000 per unit. Low- and mid-rise buildings without an elevator ranged from \$90,000 to \$130,000, and mid- to high-rise elevator buildings ranged from \$80,000 to \$110,000 per unit. On average, this equals \$105,500 per residence across BHA's portfolio of over 9,476 units.

¹⁵ New York State Energy Research and Development Authority. (2023). NYSEDA Residential Statewide Baseline Study. <https://it.nyserda.ny.gov/-/media/Project/Nyserda/Files/Publications/building-stock-potential-studies/residential-baseline-study/Vol-2-Multifamily-Res-Baseline.pdf>

¹⁶ U.S. Energy Information Administration. (2023). 2020 Residential Energy Consumption Survey (RECS) Data: Table HC6.7 Space heating in Homes in the Northeast and Midwest Regions, 2020. <https://www.eia.gov/consumption/residential/data/2020/hc/pdf/HC%206.7.pdf>

¹⁷ DataHaven. (2023). Bridgeport 2023 Equity Profile. https://ctdatahaven.org/sites/ctdatahaven/files/bridgeport_equity_2023.pdf

¹⁸ Hoffman, I., & Walker, D. (2021). Understanding Multifamily Home Energy Efficiency Potential. American Council for an Energy-Efficient Economy. <https://www.aceee.org/sites/default/files/pdfs/Multifamily%20Home%20Energy%20Efficiency%20Potential%20final%201-22-21.pdf>

¹⁹ Boston Housing Authority & Arup. (2023). BHA decarbonization pathways: A roadmap to fossil-fuel-free public housing by 2030 [technical report]. Boston Housing Authority. https://www.bostonhousing.org/BHA/media/Documents/Departments/Procurement/BHA_Arup_final_decarb_report.pdf; NEEP. (2026). Multifamily retrofit case study database. Northeast Energy Efficiency Partnerships. <https://neep.org/multifamily-retrofit-case-study-database>



Estimated Comprehensive Retrofit Cost per Residence by Building Typology ²⁰		
Building Typology	Estimated Cost Range per Unit	Program Relevance
Garden-style properties	\$100,000–\$140,000	Highest projected cost due to larger facade-area-to-volume ratio and leaky envelopes
Low- and mid-rise buildings without elevators	\$90,000–\$130,000	Substantial envelope, electrical, and mechanical system upgrade needs
Mid- to high-rise elevator buildings	\$80,000–\$110,000	Lower per-unit range but still requires major whole-building decarbonization investment
Boston Housing Authority portfolio average	\$105,500	Average across more than 9,476 residences, illustrating the scale of need for older affordable multifamily buildings

The primary cost drivers for these retrofits were space heating and domestic hot water electrification, envelope improvements, and electrical service capacity upgrades. While these are estimated and not actual expenses, there are multiple case studies of completed projects with similar project scopes from across the region that support this cost analysis.²¹

Despite this expense, NOAH properties remain a critical component of state and municipal affordable housing preservation, energy affordability, and climate goals. Because it is common in dense urban cores where higher-end market-rate apartments are expensive and subsidized affordable apartments are in high demand, these properties represent one of the few opportunities for community members to obtain low-rent housing that is close to desirable employment opportunities, schools, and transit options. Yet in many of these areas, building new subsidized affordable housing can be politically difficult and is often less cost effective than retrofitting existing buildings. A 2022 study demonstrated that the average cost of a retrofit can be as much as 30 percent lower than building a new, comparably sized building.²² At the same time, the loss of unsubsidized affordable units to disinvestment and gentrification underscores the need to preserve existing NOAH multifamily properties. Policymakers cannot choose between preserving affordability and improving building energy efficiency; they must do both simultaneously.²³

From the energy efficiency program administrator’s perspective, retrofitting multifamily buildings presents a distinct set of challenges that go beyond a simple financial analysis or estimate of energy savings potential. Program administrators must work with owners and properties with minimal cash reserves and limited

²⁰ Boston Housing Authority & Arup. (2023). BHA Decarbonization Pathways: A Roadmap to Fossil-Fuel-Free Public Housing by 2030 [technical report]. Boston Housing Authority. https://www.bostonhousing.org/BHA/media/Documents/Departments/Procurement/BHA_Arup_final_decarb_report.pdf; NEEP. (2026). Multifamily Retrofit Case Study Database. Northeast Energy Efficiency Partnerships. <https://neep.org/multifamily-retrofit-case-study-database>

²¹ Boston Housing Authority & Arup. (2023). BHA Decarbonization Pathways: A Roadmap to Fossil-Fuel-Free Public Housing by 2030 [technical report]. Boston Housing Authority. https://www.bostonhousing.org/BHA/media/Documents/Departments/Procurement/BHA_Arup_final_decarb_report.pdf; NEEP. (2026). Multifamily Retrofit Case Study Database. Northeast Energy Efficiency Partnerships. <https://neep.org/multifamily-retrofit-case-study-database>

²² Zhao, D., & Mo, Y. (2023). Construction Cost Decomposition of Residential Building Energy Retrofit. *Buildings*, 13(6), 1363. <https://doi.org/10.3390/buildings13061363>

²³ Institute for Housing Studies. (2024). *Using Data to Break Up the NOAH Monolith*. Institute for Housing Studies at DePaul University. <https://www.housingstudies.org>



administrative capacity, complex project scopes, problems related to deferred capital investment and building maintenance, and tenant-related issues like displacement prevention and cost-burden protections. Even when a comprehensive retrofit is technically feasible, efficiency programs engaging with NOAH multifamily buildings must still navigate multiple complex programmatic, financial, and logistical barriers.

Why NOAH Properties Are Hard for Programs to Serve

For NOAH multifamily properties with more than five units, the complexity of energy efficiency retrofits is multiplied at scale by the additional expense, administrative burden, and logistical difficulties inherent to projects involving large, occupied, multi-unit residential properties. Collectively, these programmatic, financial, technical, and operational dynamics make naturally occurring affordable housing with more than five units one of the more difficult segments of the residential housing sector for energy efficiency programs to reach.

Programmatic Barriers

One of the primary barriers to program uptake in NOAH multifamily properties is a lack of alignment with program requirements and rules. While many programs are designed around either single-family homes, including multi-unit dwellings of four units or less, or subsidized affordable multifamily housing with formal regulatory agreements, unsubsidized affordable properties do not neatly fit into either of these categories. Many of these properties lack formal agreements with state and federal agencies, limiting owner access to funding streams that are commonly employed by subsidized owners to pay for property upgrades like the Low-Income Housing Tax Credit (LIHTC) program. Additionally, households living in NOAH properties represent a broad variety of income levels, making rigid household income level tests difficult and administratively burdensome.²⁴

Programs that rely on narrow eligibility criteria or require documentation that is hard to obtain, such as unit-level utility data or income verification for all residents, can exclude NOAH properties, even though these properties function as de facto affordable housing for many low- and moderate-income renters. Regulated affordable housing operators are required to keep detailed records of resident income and often have property management staff that can assemble documentation or work with utilities for data access, making it easier for them to qualify for programs. When participation is effectively steered toward properties with federal subsidies or regulatory agreements, NOAH property owners are less likely to qualify for programs, be targeted for outreach, or even be aware that their property qualifies for assistance through state and utility energy efficiency programs.²⁵

²⁴ Elevate Energy. (2021). Making Naturally Occurring Affordable Housing More Efficient. <https://www.elevatenp.org/wp-content/uploads/Making-Naturally-Occurring-Affordable-Housing-More-Efficient.pdf>; National Low Income Housing Coalition. (2016, November 7). Naturally Occurring Affordable Housing Benefits Moderate Income Households, but Not the Poor. <https://nlihc.org/resource/naturally-occurring-affordable-housing-benefits-moderate-income-households-not-poor>

²⁵ Elevate Energy. (2021). Making Naturally Occurring Affordable Housing More Efficient; Northeast Energy Efficiency Partnerships. (2024, April 25). The Problem in Multifamily Energy Data Access. <https://neep.org/blog/problem-multifamily-energy-data-access>; Reinvestment Fund. (2019). Maybe It Really Does Take a Village: Supporting the Creation of High-Quality Unsubsidized Affordable Rental Housing in Legacy Cities. <https://www.reinvestment.com/wp-content/uploads/2019/05/Reinvestment-Fund-Policy-Report-Working-Paper-NOAH.pdf>



Program and Project Complexity

Even when building owners are actively interested in participating in a retrofit program, the complexity of accessing and navigating the process can dissuade them from following through. Engaging with multiple programs (e.g., predevelopment assistance, funding for health and safety repairs, efficiency upgrade loans and incentive programs, solar leases, etc.) can result in owners managing multiple applications, approval processes, timelines, and reporting requirements. This administrative burden reduces program uptake, particularly for under-resourced landlords. For building owners who attempt to leverage retrofit programs with limited support staff, or administrative capacity, fragmented program requirements can quickly become unmanageable, increasing the risk of project complications or owners withdrawing from the program.

Aside from the difficulties of accessing and navigating a retrofit program, projects at older multifamily properties can be unpredictable, expensive, and difficult to finance. For buildings with issues like mold and asbestos, inadequate wiring, or structural repairs that must be resolved before efficiency upgrades can take place, financing programs that offer flexible capital with reasonable terms can be fractured and competitive, with many running out of money quickly due to high demand. Without access to capital to resolve these pre-weatherization barriers, properties are deferred from programs with limited or no options for funding these repairs or reengaging with the program later.²⁶

Adding to these practical complexities, aligning schedules among owners, tenants, contractors, inspectors, and underwriters is complex. Delays can increase project costs and erode tenant and owner confidence. For many NOAH multifamily owners, particularly smaller, non-institutional landlords, the administrative and practical complexities that are inherent to efficiency upgrade and building retrofit projects can be a significant barrier to participation.

Financing NOAH Multifamily Energy Retrofits

Comprehensive rehabilitation projects are difficult to finance at NOAH properties due to thin operating profit margins, limited cash reserves, and deferred maintenance issues that complicate project scopes. To address urgent repairs or major equipment failures, owners typically rely on property cash reserves, conventional mortgage debt, and short-term financing. For major rehabilitation projects, NOAH properties cannot access enhanced financing mechanisms like the Low-Income Housing Tax Credit (LIHTC) program, preferred loans, and other concessional debt typically used to finance retrofits at subsidized affordable properties. This lack of a clear financing pathway for NOAH properties often forces owners to make piecemeal repairs rather than take on comprehensive upgrade projects.²⁷

²⁶ National Housing Trust (2022). Response to Request for Information on Green and Resilient Retrofit Program. https://nationalhousingtrust.org/sites/default/files/documents/nht-comments-final-hud-2022-0072-0001_0.pdf

²⁷ Department of Energy Financing Solutions Working Group. (2017). Energy Financing for Low- and Moderate-Income Households: Current State of the Market, Issues, and Opportunities. <https://www.energy.gov/sites/default/files/2021-07/ee-financing-lmi.pdf>



From a loan underwriting perspective, project financing depends on the ability of the property to pay off the resulting debt with post-upgrade net operating income. For lower-value buildings, which are typical of NOAH properties, financials may not support the significant debt often required for these projects, even when capital needs are pressing or obvious. This lack of access to capital is challenging for small developers and owners with limited resources, particularly when a single project encompasses multiple significant upgrades such as substantial building envelope work, boiler or chiller replacement, electrical panel and wiring upgrades, and health and safety hazard remediation, e.g., mold and asbestos removal. Even though these upgrades can dramatically improve a building's efficiency, retrofits do not always generate cost savings that are sufficient to support conventional debt repayment, further complicating project underwriting and increasing the risk of rent increases and tenant displacement.²⁸

THE NOAH FINANCING BOTTLENECK

NOAH owners often need capital for multiple things at once: deferred maintenance, building repairs, electrical upgrades, and health and safety hazard remediation. Because these properties are not regularly inspected like subsidy-based affordable properties, owners are less motivated to engage in comprehensive capital improvement projects.

Property Owners: Awareness, Trust, and Capacity

NOAH property owners do not fit within a single, uniform category. Ownership structures range from small landlords with one building, to emerging developers with modest portfolios, family-owned businesses, corporate developers, and mission-driven housing organizations. Across these ownership models, several common challenges constrain uptake of energy efficiency programs.

Owners may not be aware of available programs, or they may be confused about which program applies to their property. Many property owners have limited time and administrative bandwidth to complete documentation, attend site visits, or coordinate with contractors; particularly when they own multiple properties or operate other businesses.²⁹ Some owners may be skeptical about the complexity of efficiency upgrade programs. Others may have had mixed experiences with past state or municipal programs. Some owners of properties with deferred maintenance issues are hesitant to interact with local agencies for fear of drawing unwanted attention from building code enforcement or the local health department.³⁰

²⁸ Department of Energy Financing Solutions Working Group. (2017). Energy Financing for Low- and Moderate-Income Households: Current State of the Market, Issues, and Opportunities. <https://www.energy.gov/sites/default/files/2021-07/ee-financing-lmi.pdf>

²⁹ Dreho, A., & Ross, L. (2016). Reaching More Residents: Opportunities for Increasing Participation in Multifamily Energy Efficiency Programs (Report U1603). American Council for an Energy-Efficient Economy. <https://www.aceee.org/sites/default/files/publications/researchreports/u1603.pdf>; Jarrett, M., & Ross, L. (2016). Achieving High Participation in Multifamily Programs. In Proceedings of the 2016 ACEEE Summer Study on Energy Efficiency in Buildings (pp. 7-375–7-386). American Council for an Energy-Efficient Economy. https://www.aceee.org/files/proceedings/2016/data/papers/7_375.pdf

³⁰ ILLUME Advising. (2020). Addressing Multifamily Hesitance to Participation in Energy Efficiency Programs. ILLUME Advising. <https://illumeadvising.com/files/Addressing-Multifamily-Hesitance-to-Participation-in-Energy-Efficiency-Programs.pdf>; NMR Group, Inc., & DNV. (2022). Small Multifamily Barriers Study (MA21R36-B-MFB). Massachusetts Energy Efficiency Advisory Council. https://ma-eeac.org/wp-content/uploads/MA21R36-B-MFB-Small-MF-Barriers_Report_FINAL_11MAR2022.pdf



Because they commonly operate outside of formal subsidy programs and trade associations, NOAH property owners tend to have fewer interactions with housing agencies, utility program administrators, or large lenders that could potentially steer them toward resources.³¹ Without proactive, relationship-based outreach from trusted intermediaries, many owners simply never engage with energy efficiency programs.³²

Split Incentives and Affordability

Because multifamily renters are typically responsible for their own utility costs, energy efficiency improvements that lower energy consumption in apartments have limited benefits for the property's owner. For landlords who do not pay for in-unit utility costs, there may be little motivation to participate in a program that only lowers expenses for the tenant.³³

For building owners who do participate in a retrofit program, particularly in areas under pressure from rising rents and gentrification, it may be tempting to increase rent or sell the property after upgrades have increased the property's value. This issue is problematic in low-income multifamily properties where there are no

regulatory agreements to deter landlords from post-retrofit rent increases or property sales.³⁴

THE LANDLORD/TENANT SPLIT INCENTIVE

The split incentive occurs when landlords pay for building upgrades but tenants capture much of the savings through lower energy bills, reducing the owner's incentive to invest in efficiency improvements.

Efficiency programs can also lead to unintended consequences for tenant energy burden. Electrification and fuel switching can shift costs in ways that do not work in a tenant's favor, and landlords who are not directly impacted if tenant utility costs increase following a retrofit project may not be motivated to intervene. If a building switches from master metering to individually

metered units, this shift may also result in significant increases in tenant utility bills. Although building retrofits are intended to improve efficiency and affordability, the split incentive can leave tenants at risk of bearing higher utility costs for work they did not choose to have done with limited avenues of recourse after the project is complete.³⁵

³¹ Elevate Energy et al. (2016). Making Naturally Occurring Affordable Housing More Efficient (Issue brief). Elevate Energy. <https://www.elevatenp.org/wp-content/uploads/Making-Naturally-Occurring-Affordable-Housing-More-Efficient.pdf>

³² ILLUME Advising. (2020). Addressing Multifamily Hesitance to Participation in Energy Efficiency Programs. ILLUME Advising. <https://illumeadvising.com/files/Addressing-Multifamily-Hesitance-to-Participation-in-Energy-Efficiency-Programs.pdf>; NMR Group, Inc., & DNV. (2022). Small Multifamily Barriers Study (MA21R36-B-MFB). Massachusetts Energy Efficiency Advisory Council. https://ma-eeac.org/wp-content/uploads/MA21R36-B-MFB-Small-MF-Barriers_Report_FINAL_11MAR2022.pdf

³³ Bird, S., & Hernández, D. (2012). Policy Options for the Split Incentive: Increasing Energy Efficiency for Low-Income Renters. Energy Policy, 48, 506–514. <https://pmc.ncbi.nlm.nih.gov/articles/PMC4819331/>

³⁴ Elevate Energy. (2021). Making Naturally Occurring Affordable Housing More Efficient. <https://www.elevatenp.org/wp-content/uploads/Making-Naturally-Occurring-Affordable-Housing-More-Efficient.pdf>; Reinvestment Fund. (2019). Maybe It Really Does Take a Village: Supporting the Creation of High-Quality Unsubsidized Affordable Rental Housing in Legacy Cities (Working paper). <https://www.reinvestment.com/wp-content/uploads/2019/05/Reinvestment-Fund-Policy-Report-Working-Paper-NOAH.pdf>

³⁵ Bird, S., & Hernández, D. (2012). Policy Options for the Split Incentive: Increasing Energy Efficiency for Low-Income Renters. Energy Policy, 48, 506–514. <https://pmc.ncbi.nlm.nih.gov/articles/PMC4819331/>; Maryland Office of People's Counsel. (n.d.). Individual Meters vs Master Meters. <https://opc.maryland.gov/Consumer-Learning/Electricity/Individual-vs-Master-Metering>



Tenants: Engagement and Communication

Most programs have limited direct interaction with tenants in unsubsidized affordable housing, focusing instead on the owner as the customer. Tenants typically have limited involvement in the decision-making process, even though many are directly impacted by energy efficiency programs because they pay for their own utilities. Additionally, residents may be anxious about the implications of energy efficiency programs on utility bills and rent, or the potential for disruption or displacement during or after upgrades have taken place.³⁶

Effective tenant outreach can help address these concerns while also coordinating access to apartments during upgrades and supporting residents to ensure they are using new equipment correctly after the project is complete. However, providing this degree of sustained engagement and ongoing communication with tenants can be expensive, time-consuming, and administratively challenging for program administrators, building owners, and property managers.³⁷

Regional Program Models That Meet the Challenges of NOAH Multifamily Properties

Collectively, these challenges demonstrate that advancing energy efficiency retrofits in low-income unsubsidized multifamily housing requires solving problems that go beyond simple program design issues. Multiple barriers intersect to create complexity that can quickly push projects beyond the financial and administrative capacity that an energy efficiency program can realistically provide. Barriers and challenges include high upfront capital needs, fragmented and hard-to-access financing streams, implementation strategies that are complex and difficult to standardize, landlord-tenant split incentives, and limited owner capacity. In addition to the technical and financial complexity of addressing NOAH multifamily properties, many state and utility income-qualifying programs have historically been designed using a narrow definition of residential housing with a focus on single-family and two-to-four-unit buildings, while larger multifamily buildings are often classified as commercial properties. In the past, income-qualifying multifamily programs tended to default to subsidized affordable properties, where resident household income is relatively easy to document through property-level regulatory agreements and deed restrictions.

However, regional programs are increasingly recognizing unsubsidized low-income multifamily housing as a distinct market segment and adjusting income-qualifying multifamily program design to better reflect the market's ownership structures, financing constraints, and need for tenant protections. This recognition highlights the importance of NOAH properties as a critical source of affordable housing in cities across the

³⁶ American Council for an Energy-Efficient Economy. (2013). Multifamily Energy Efficiency: Market Segments and Marketing Channels. <https://www.aceee.org/sites/default/files/effective-marketing.pdf>; Renters' Worries About Bills, Rent, and Eviction. Smart Energy Consumer Collaborative. (2022, January 2). What's Stopping Renters from Engaging in Energy? <https://smartenergycc.org/whats-stopping-renters-from-engaging-in-energy/>; Context / Thomson Reuters Foundation. (2025, April 9). U.S. Renters Fear Higher Rent, Eviction Over Energy Efficient Homes. <https://www.context.news/just-transition/us-renters-fear-higher-rent-eviction-over-energy-efficient-homes>

³⁷ ILLUME Advising. (2025, September 29). Increasing Energy Efficiency Program Participation Among Renters and Landlords. <https://illumeadvising.com/2025/increasing-energy-efficiency-program-participation-among-renters-and-landlords/>



region while acknowledging the unique and highly localized characteristics that make the sector challenging to address. To ground the challenges and opportunities of NOAH properties in real-world market conditions and illustrate how regional state and utility programs are adapting to serve this market, it is instructive to examine programs within the context of specific municipalities to show how these properties manifest in markedly different ways across the region.

Why Four Case Studies?

- Demonstrate the scale of NOAH multifamily properties in regional housing markets
- Highlight how multifamily building typologies and market conditions vary widely across regional cities
- Underscore the importance of local context for market analysis and program design
- Show how state and utility income-qualifying programs are being implemented at the local level

By examining four regional states with a focus on the key stakeholders, the problems they are attempting to solve, and the resulting practices emerging from these efforts, patterns begin to appear that can inform a set of recommendations intended to refine and scale programs that improve energy efficiency at naturally occurring affordable multifamily properties.

Regional Case Studies: Emerging Models for Serving NOAH Multifamily Properties

CASE STUDY 1: Affordable Multifamily Energy Efficiency Program (AMEEP) | New York City

Featured Best Practices: Innovative State/Utility Partnerships and Accessible Program Design

Program Structure and Governance: The New York state Affordable Multifamily Energy Efficiency Program (AMEEP) is a statewide program launched in 2022 and co-administered by the Joint Utilities of New York in coordination with NYSEERDA. In New York City, Con Edison and National Grid administer AMEEP in their respective and overlapping service territories, while NYSEERDA supports related technical assistance offerings and administers a separate upstate affordable multifamily program. Con Edison works with a network of contractors that not only help scope and implement projects but also provide on-the-ground feedback that helps program administrators refine delivery and address participation bottlenecks.³⁸

Challenges and Opportunities: New York City features one of the largest and oldest unsubsidized multifamily rental markets in the country. The city is home to approximately 8.48 million residents, and more than 60 percent of households rent rather than own.³⁹ The rental vacancy rate in the city is around 1.4 percent,

³⁸ Enterprise Community Partners. (2023). Green Funding and Resources for New York Affordable Multifamily Housing (Guide 2023-R3). <https://www.enterprisecom-munity.org/sites/default/files/2023-12/2023-013-Green-Funding-and-Resources-Guide-2023-R3.pdf>; Con Edison. (2026). Affordable Multifamily Energy Efficiency Program. <https://www.coned.com/en/save-money/rebates-incentives-tax-credits/rebates-incentives-for-multifamily-customers/affordable-buildings>

³⁹ New York City Department of City Planning. (2025). New York City's Population Estimates and Trends. (2025). https://www.nyc.gov/assets/planning/downloads/pdf/our-work/reports/new-york-city-population-estimates-and-trends_may-2025.pdf; New York City Rent Guidelines Board. (2025). 2025 Housing Supply Report (share of renters; prevalence of multifamily rental). <https://rentguidelinesboard.cityofnewyork.us/wp-content/uploads/2025/05/2025-HSR.pdf>



making it a competitive market for renters.⁴⁰ Most of the city’s rental units are in multifamily buildings, and over half of all housing units in the city are in buildings constructed prior to 1947.⁴¹ According to a 2023 citywide analysis, there are approximately 50,000 unsubsidized apartments with rents that align with municipal affordability definitions, roughly 30-80 percent of AMI. Of these, around 8,800 units are affordable at or below 50 percent AMI with the majority falling within the “at or below” 60-80 percent AMI range.⁴² Internal market research conducted by Con Edison for AMEEP suggests that, when using a broader definition to include any older, unsubsidized multifamily buildings with comparatively low rent and significant capital needs, there could be as many as 200,000 apartments that meet these parameters in the city.

Multifamily buildings over 25,000 square feet, or campus-style properties with multiple buildings exceeding 50,000 square feet, must comply with emission limits under the city’s building performance ordinance Local Law 97, adding the burden of having to meet compliance deadlines to existing market pressures for owners of larger NOAH buildings.⁴³ These unsubsidized affordable units are part of New York City’s unregulated private rental market. A second, distinct market segment is the city’s rent-regulated apartments, where rents are determined by city statute rather than by subsidy programs or market conditions. Around 40 percent of the city’s multifamily building stock, or more than 960,000 units, are rent regulated, and around 780,000 of these apartments are in buildings constructed before 1974.⁴⁴ Rent-regulated apartments are limited to multifamily buildings with six or more units and can be considered NOAH-adjacent in that they are typically older and face many of the same barriers in terms of energy efficiency program uptake, such as significant capital needs. Annual rent increases are capped by the city’s Rent Guidelines Board, limiting the property owner’s ability to recover capital investments through higher rents.⁴⁵ And like NOAH properties, rising operating costs and the lack of access to capital for building upgrades leaves rent-regulated apartments at risk of underinvestment and deterioration.⁴⁶ For owners of rent-regulated buildings that meet the square footage threshold to be considered a covered building under Local Law 97, the city offers alternative compliance pathways and support.⁴⁷ Even with this support, these owners must navigate the complexity of an energy efficiency upgrade project, which can be particularly challenging in the context of constrained administrative capacity, project capital, and aging buildings with extensive deferred maintenance issues.

⁴⁰ New York City Housing Development Corporation. (2024, February 7). New York City’s Vacancy Rate Reaches Historic Low of 1.4 Percent, Demanding Urgent Action. <https://www.nychdc.com/newsroom/new-york-citys-vacancy-rate-reaches-historic-low-14-percent-demanding-urgent-action-new>

⁴¹ Citizens Housing & Planning Council. (2026). Taking Stock: The Age of New York City’s Housing Stock. <https://chpcny.org/visualization/housing-stock-visualization/>

⁴² NYU Furman Center. (2026). State of the City’s Housing Stock. (2023). <https://www.furmancenter.org/soc-report/state-of-new-york-citys-housing-and-neighborhoods-in-2023/state-of-the-citys-housing-stock>; New York City Rent Guidelines Board. (2025). 2025 Housing Supply Report. <https://rentguidelinesboard.cityofnewyork.us/wp-content/uploads/2025/05/2025-HSR.pdf>

⁴³ NYC Accelerator. (n.d.). Local Law 97. <https://accelerator.nyc/ll97>

⁴⁴ NYU Furman Center. (2026). Rent-Stabilized Buildings – Data Visualization. <https://www.furmancenter.org/wp-content/uploads/data/html/rent-stabilized-units-san-key-202511.html>; NYU Furman Center. (2026). Data Brief: Legacy 90%+ Rent-Stabilized Properties. <https://www.furmancenter.org/publication/data-brief-legacy-90-rent-stabilized-properties/>

⁴⁵ New York City Rent Guidelines Board. (2025). Rent Guidelines for October 1, 2025 Through September 30, 2026 (guidelines and explanatory statements). <https://rentguidelinesboard.cityofnewyork.us/wp-content/uploads/2025/05/2025-HSR.pdf>

⁴⁶ Community Preservation Corporation. (2025). Rent-Regulated Portfolio Data Brief, 2020–2024. <https://communitycp.com/insights/rent-regulated-portfolio-data/>

⁴⁷ NYC Accelerator. (2022). Understanding Alternative Compliance Pathways for Affordable Housing (Prescriptive Pathways handout). <https://hcr.ny.gov/fact-sheet-26>



New York City's affordable housing stock is also under constant pressure from a variety of other market conditions. Over the past few decades, New York City has seen a net loss of between 130,000 and 140,000 affordable units through deregulation (a pathway that was discontinued in 2019), conversion to owner-occupied cooperatives, substantial rehabilitation and repositioning to market-rate apartments, or property demolition.⁴⁸ Due to the city's low vacancy rate and the regulatory complexity of the rental housing market, owners of older NOAH multifamily buildings and rent-regulated properties, particularly at smaller properties not covered by Local Law 97, face strong incentives to defer energy efficiency upgrades, making proactive outreach and support for energy efficiency work critical.

How the Program Works: Through AMEEP, Con Edison and its partners seek to improve energy efficiency in these properties by making it more technically and financially feasible for projects to move forward.⁴⁹ AMEEP is designed to reach both subsidized and unsubsidized affordable multifamily properties by pairing flexible program pathways with simplified affordability tests. The program offers two primary tracks:

1. **Noncomprehensive Pathway for projects with limited scopes**
2. **Comprehensive Pathway** for bundled measures including central systems, in-unit equipment, ventilation projects, weatherization, building envelope improvements, lighting, and appliances. Projects in the Comprehensive Pathway begin with a no-cost pre-inspection through the program. Where deeper audit work is needed, owners may access subsidized technical assistance and separate NYSERDA support for audit costs, but a full audit is not a strict program requirement for participation.⁵⁰

Across both pathways, Con Edison's programs in New York City provide three incentive tiers ranging from \$1,000 to \$2,200 per unit, with incentives typically capped at a share of the total project cost. To reduce cash-flow barriers for owners, incentives can be issued at mid-construction and final-construction milestones rather than only after full project completion. This staged payment structure is especially important for NOAH properties with limited cash reserves and inadequate financing capacity.

To participate in AMEEP, properties must be five or more units with their affordable or rent-regulated status verified via formal housing agency regulatory agreements or building rent rolls.⁵¹ Participating properties can demonstrate eligibility with regulatory agreements, HUD or LIHTC contracts, or similar program documentation. However, the program also offers an alternative "rent roll" eligibility determination pathway for NOAH properties, which does not require burdensome direct income verification from tenants. Under the

⁴⁸ New York City Rent Guidelines Board. (2025). Changes to the Rent Stabilized Housing Stock in NYC in 2024. <https://rentguidelinesboard.cityofnewyork.us/wp-content/uploads/2025/05/2025-Changes-Report.pdf>; The Builders Institute of New York. (2022). The Housing Stability and Tenant Protection Act: Early Impacts on New York City's Rent-Stabilized Housing Stock. <https://www.buildersinstitute.org/wp-content/uploads/2023/02/Housing-Stability-and-Tenant-Protection-Acts--Early-Impacts--FINAL--BRI.pdf>

⁴⁹ NYU Furman Center. (2025, April 9). HSTPA and the Long-Run Sustainability of the Pre-1974, 100 Percent Rent-Stabilized Housing Stock (testimony before the New York City Rent Guidelines Board). <https://www.buildersinstitute.org/wp-content/uploads/2023/02/Housing-Stability-and-Tenant-Protection-Acts--Early-Impacts--FINAL--BRI.pdf>

⁵⁰ Con Edison. (n.d.). Affordable Multifamily Energy Efficiency Program. <https://www.coned.com/en/save-money/rebates-incentives-tax-credits/rebates-incentives-for-multifamily-customers/affordable-buildings>; Joint Utilities of New York. (2021). New York State Affordable Multifamily Energy Efficiency Program – Downstate Incentive Fact Sheet. <https://www.nationalgridus.com/media/pdfs/buses-ways-to-save/ameep-downstate-incentive-fact-sheet.pdf>

⁵¹ <https://www.coned.com/en/save-money/rebates-incentives-tax-credits/rebates-incentives-for-multifamily-customers/affordable-buildings>



EMERGING BEST PRACTICE: PROXY-BASED INCOME VERIFICATION

AMEEP is notable because it allows property owners to demonstrate household income through a rent-roll pathway rather than relying only on formal subsidy documentation or direct tenant income verification. For NOAH properties, this lowers administrative burden and makes participation for small owners and developers more accessible.

rent-roll pathway, owners provide the unit's annual rent, size, and occupancy count, and the program uses this information to calculate household income by assuming 30 percent of earnings are paid in rent. The property qualifies for AMEEP if at least 25 percent of its units are affordable for someone earning at or below 80 percent of AMI. To lower administrative barriers for small, capacity-constrained building owners, Con Edison offers online tools and calculators to help owners determine if their buildings meet the program's affordability criteria.⁵²

Why It Matters for NOAH Multifamily Properties: Because AMEEP is co-designed by the state and utilities, anchored in a flexible definition of affordability, and allows for coordinated documentation to demonstrate eligibility, older multifamily buildings with low rents can access comprehensive upgrades even if they do not participate in a federal, state, or municipal housing subsidy program. In a rental-dominant market where many low- and moderate-income households live in unsubsidized multifamily housing, hinging program access on the building's actual affordability profile rather than its participation in programs like LIHTC is a key best practice to ensuring NOAH properties can access state and utility efficiency upgrade incentives. Con Edison designed AMEEP to be flexible, offering a Comprehensive Pathway for deep energy retrofit projects or a Non-Comprehensive Pathway for more limited scopes of work. This dual approach ensures the program can adapt to New York City's diverse building stock and accommodate varying levels of project funding, owner capacity, and project readiness. AMEEP has increasingly emphasized electrification measures that convert delivered fuel systems to efficient electric equipment, along with envelope improvements and central-system upgrades.

Early program results indicate meaningful reductions in building-level energy use and operating costs, though the extent to which savings flow directly to tenants depends on metering configuration, rent structure, and whether improvements are made to central or in-unit systems. At the portfolio level, AMEEP's impacts are assessed through standardized evaluation, measurement, and verification processes, and recent impact evaluations in Con Edison's service territory indicate that realized savings are consistent with program planning assumptions, supporting the case that AMEEP is a prudent use of ratepayer funds.⁵³

⁵² New York State Public Service Commission. (2023, November 15). Case 18-M-0084 et al., Joint Utilities – AMEEP Implementation Filing. <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7B6057D98B-0000-C912-9B64-A2D769C4790D%7D>; Con Edison. (2024, December 31). Requirements for Affordable Housing Incentives. <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?Mattercaseno=18-M-0084>

⁵³ Consolidated Edison Company of New York, Inc. (2025). Con Edison electric and gas rate case: Exhibits 1–7–1 (Exhibit No. CES-Exhibits-1-7-1). <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=25-E-0072>; ILLUME Advising, LLC, & DNV Energy Insights, Inc. (2025, March 24). 2022–2023 Affordable Multifamily Energy Efficiency Program impact evaluation: <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7B60052696-0000-C03F-8A82-FF4E376672CE%7D&DocTitle=CECONY%20AMEEP%20Program%20PY2022-2023%20Impact%20Evaluation%20Report>



Streamlining program access and offering technical assistance are also important strategies for reaching the individual owners and emerging developers that are common in the NOAH sector while ensuring building upgrade projects are as comprehensive as possible. Small ownership entities are typically capacity-constrained and lack sufficient administrative, operational, and development staff support to manage a complex building upgrade project. By reducing administrative friction through streamlined access to incentives, and offering technical assistance to overcome program complexity, AMEEP allows owners of low-income multifamily buildings to undertake more comprehensive building upgrade projects.⁵⁴

New York is seeking additional ways to address barriers to energy efficiency and electrification in NOAH multifamily properties. In its 2025-2029 rate case submission to the New York Public Service Commission, Con Edison proposed an Affordable Multifamily Electrification Pilot to address cost-shifting concerns associated with electrification, but that pilot was not ultimately included in the final joint proposal or commission order.⁵⁵ Similarly, in fall 2025, NYSERDA issued an RFP to fund a comprehensive appraisal of potential solutions for the issue of cost shifting in multifamily buildings. While utility costs for tenants at subsidized affordable properties are regulated through a utility allowance program administered by federal, state, and local housing agencies, tenants at unsubsidized properties do not enjoy similar protections from the potential for substantially higher utility costs that can result from cost shifting after a building is upgraded, making the issue a significant barrier to scaling programs that address NOAH properties.⁵⁶

Key Takeaways

New York's evolving efforts to address NOAH multifamily properties illustrate how a coordinated state-utility program can move beyond offering rebates and begin to develop a more integrated strategy of tailored program offerings, end-to-end technical assistance, and embedded tenant protections. By aligning program eligibility with property rent affordability, tailoring and streamlining program delivery through multiple program pathways, and proactively engaging in research to overcome persistent program barriers, stakeholders in New York City are implementing a model that has the potential to enhance program effectiveness with consideration for owner constraints and tenant protections.

⁵⁴ Con Edison. (n.d.). Affordable Multifamily Energy Efficiency Program. <https://www.coned.com/en/save-money/rebates-incentives-tax-credits/rebates-incentives-for-multifamily-customers/affordable-buildings>; Con Edison. (2026). 2026 Multifamily Energy Efficiency Program Incentives [fact sheet]. https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={80EFFC9C-0000-CE36-B36F-FEA43D0D9D3C}&DocTitle=MFEPP%20AMEEP%202026%20Program%20Manual_V1; American Council for an Energy-Efficient Economy. (2013). Best Practices for Multifamily Energy Efficiency Programs. <https://www.aceee.org/sites/default/files/publications/researchreports/e13n.pdf>

⁵⁵ Consolidated Edison Company of New York. (2024–2025). CES Exhibits 1–7, Affordable Multifamily Electrification Pilot rate case filing.

⁵⁶ Rocky Mountain Institute. (2026). Policies and Incentive Programs – Multifamily Affordable Housing Decarbonization Toolkit. <https://rmi.org/multifamily-affordable-housing-decarbonization-toolkit/policies-and-incentive-programs/>



CASE STUDY 2: Connecticut: Coordinating Multiple State Tools for NOAH Properties | Bridgeport, CT

Featured Best Practices: Multi-Agency Collaboration and Community-Driven Continuous Improvement

Program Structure and Governance: Connecticut’s approach to serving NOAH properties is not centered on a single program. Instead, it relies on a combination of utility-administered conservation programs governed through the Public Utility Regulatory Authority’s (PURA) Conservation and Load Management (C&LM) framework, policy and working groups led by the Department of Energy and Environmental Protection (DEEP), and housing and retrofit funding tools overseen by the Office of Affordable Housing and related housing and finance entities. This case study uses Bridgeport to illustrate how those statewide tools matter in a local market with a large stock of older unsubsidized multifamily housing. Under the C&LM plans approved by PURA, utilities including Eversource and United Illuminating administer Energize CT multifamily offerings, while DEEP convenes working groups with the Connecticut Green Bank, Department of Housing (DOH), and the Connecticut Housing Finance Authority (CHFA) to recommend enhancements and coordinate with housing and finance programs.

For the purposes of this case study, Energize CT’s multifamily offerings are treated as the primary program administrator of utility-funded efficiency services, with the Office of Affordable Housing Energy Retrofit (AHER) and the Green Bank providing complementary capital for qualifying properties. The Green Bank administers loan instruments such as C-PACE and other enhanced financing that can be layered with incentives, and AHER manages complementary retrofit grants and loan funds for affordable multifamily properties. In Bridgeport, these statewide structures translate into a local landscape where utility-administered efficiency programs, AHER-backed financing tools, and community-based organizations together shape how NOAH multifamily properties access retrofit resources.

Challenges and Opportunities: Bridgeport is one of Connecticut’s largest rental markets, including a high share of low-income households living in aging multifamily properties. The city is home to roughly 145,000 residents and slightly more than half are renters. Around 65 percent of the city’s housing units are in multifamily buildings, and 75 percent of these buildings were built before 1970, with approximately half constructed before 1950.⁵⁷ Only 21 percent of Bridgeport’s multifamily units are subsidized, leaving many of the city’s low-income renters reliant on older, unsubsidized multifamily apartments for access to affordable housing.⁵⁸ Because a much larger share of Bridgeport households face low incomes than the share of subsidized multifamily units would suggest, many renters depend on older unsubsidized multifamily buildings for relatively lower-cost housing. Rent affordability is a critical concern for many in the city, where 64 percent of renter households are cost-burdened, and the average resident spends 5.2 percent of household income on utility expenses, just below the 6 percent “high energy burden” threshold, yet well above the state average of 3 percent.⁵⁹

⁵⁷ DataHaven. (2023). Bridgeport 2023 Equity Profile. https://ctdatahaven.org/sites/ctdatahaven/files/bridgeport_equity_2023.pdf

⁵⁸ City of Bridgeport. (2023). Bridgeport Affordable Housing Plan. https://www.bridgeportct.gov/sites/default/files/2023-12/Bridgeport_Affordable_Housing_Plan_Aproved_10.16.2023.pdf

⁵⁹ Connecticut Housing Finance Authority. (2019). Connecticut’s Largest Cities: Comparing Housing and Cost Burden. https://www.chfa.org/assets/1/6/Comparing_Connecticuts_Largest_Cities.pdf; Partnership for Strong Communities. (n.d.). Connecticut – Housing Data Profiles. <https://housingprofiles.pschohousing.org/profile/>; Sierra Club Connecticut. (2021). Addressing Energy Burden. <https://connecticut.sierraclub.org/addressingenergyburden>



Group	Approximate Renter Energy Burden (% of Household Income) ⁶⁰	Notes
Average household	3	Typical national average household energy burden
Low-income households	6	About twice the average; commonly classified as “high burden”
Low-income renters/multifamily	9-10	About three times the average; often in “severe burden” range

Small and mid-size multifamily buildings are critical for the city’s affordable housing needs, but these properties face mounting pressures related to disinvestment, rising energy costs, and high rents in surrounding communities that drive renters to Bridgeport in search of lower cost housing.

These market dynamics leave the city’s low-income renters at higher risk of living in unhealthy homes that deteriorate until they are uninhabitable, or facing displacement when properties are upgraded and repositioned to higher income markets. In response, CT DEEP has begun to treat unsubsidized low-income multifamily housing as a distinct market segment, recognizing that preserving this building stock in cities like Bridgeport requires tailored financing and incentives and direct engagement with owners who have historically been hard to reach.

How the Program Works: Through Energize CT, utilities implement the Multifamily Initiative as a single point of entry for five-plus unit properties. Offerings include building assessments, direct install measures, and incentives that can cover up to 100 percent of select energy efficiency measures for income-eligible properties.⁶¹ CT DEEP structures income-qualifying programs based on a threshold share of units of at least 66 percent of households at or below 60 percent of state median income.⁶² To reduce administrative burden on the single-building owners and small and emerging property developers common to NOAH properties, CT DEEP and its utility partners are increasingly allowing eligibility to be demonstrated through rent-roll analysis based on HUD’s Fair Market Rents determinations, an approach the state has already been using in its Residential Renewable Energy Solutions (RRES) solar tariff program. To enhance program delivery, Connecticut is working to establish unique interagency frameworks with the intention of aligning the state’s energy efficiency and affordable housing preservation goals.⁶³

⁶⁰ U.S. Department of Energy. (2020). How High Are Household Energy Burdens? Office of Energy Efficiency and Renewable Energy. <https://www.aceee.org/research-report/u2006>; American Council for an Energy-Efficient Economy. (2016). Lifting the High Energy Burden in America’s Largest Cities: How Energy Efficiency Can Improve Low Income and Underserved Communities. <https://www.aceee.org/sites/default/files/publications/researchreports/u1602.pdf>

⁶¹ Energize Connecticut. (n.d.). Connecticut Multifamily Energy Efficiency Initiative. <https://www.energizect.com/multifamily>; Energize Connecticut. (n.d.). Multifamily Initiative – Program Sheet. <https://www.energizect.com/media/31501/download?inline>

⁶² Connecticut Department of Energy & Environmental Protection. (n.d.). Bureau of Energy & Technology Policy (BETP) Programs. <https://portal.ct.gov/deep/energy/betp-programs>

⁶³ Connecticut Housing Finance Authority. (2025, February 12). Energy Efficiency as a Tool for Developing and Preserving Affordable Housing. <https://www.chfa.org/the-intersect/energy-efficiency-as-a-tool-for-developing-and-preserving-affordable-housing/>; Connecticut Department of Energy & Environmental Protection. (2025). The Office of Affordable Housing and Energy Retrofits Annual Report. https://portal.ct.gov/-/media/deep/energy/aher/aher-legislative-report_2025.pdf; Connecticut Department of Energy & Environmental Protection. (2026, March 18). DEEP Announces RFI and Informational Meeting on Affordable Multifamily Revolving Loan Program. <https://portal.ct.gov/deep/news-releases/news-releases---2026/deep-announces-rfi-and-informational-meeting-on-affordable-multifamily-revolving-loan-program>



In 2021, the state directed CT DEEP to establish an energy efficiency retrofit-grant program for affordable housing that expressly authorizes the agency to coordinate with other housing-focused state and quasi-governmental agencies in the development and administration of the program. More recent Connecticut legislation, including Public Acts 23-205, 24-151, and 25-125, provides a more accurate basis for describing the state's retrofit and load growth authorities than the earlier ARPA-focused framework alone. State statutes use a broad definition of affordable housing based on rent and income thresholds, allowing both subsidized and unsubsidized affordable rentals to fall under the retrofit-grant program's authority. In its most recent Conservation and Load Management Plan, CT DEEP builds on this statutory framework by embedding equity, greenhouse gas reduction goals, and energy affordability as key priorities and by committing to collaborate with utilities, DOH, CHFA, and the Green Bank to align efficiency and electrification with affordable housing preservation goals, particularly in economically distressed and environmental justice communities.⁶⁴

CT DEEP added a structured governance and engagement layer to this energy-housing partnership within its Equitable Energy Efficiency (E3) proceeding. This ambitious strategy features eight goals and 19 action items, including streamlining program access by coordinating income verification with other state assistance programs, positioning the affordable housing retrofit grant program to align with existing energy efficiency incentive programs, and expanding engagement with property owners, renters, and other stakeholders.⁶⁵ In 2024, CT DEEP established the Office of Affordable Housing Energy Retrofits (AHER), a dedicated office that administers its multifamily programs. To meet the state's mandates for informing program design and implementation through enhanced outreach and engagement, AHER convenes ongoing working group meetings with key stakeholders via its Affordable Housing Working Group, as well as a series of public-facing roundtables that brought together DEEP, DOH, CHFA, the Green Bank, utilities, owners, residents, advocates, and community organizations to discuss specific program barriers and opportunities.⁶⁶ Feedback from these

EMERGING BEST PRACTICE: COLLABORATIVE PROGRAM DESIGN

Connecticut's Office of Affordable Housing Energy Retrofits uses an iterative, stakeholder-informed approach to program design that brings housing, community, and energy partners into the process of tailoring solutions for the state's affordable multifamily buildings.

⁶⁴ Connecticut Department of Energy & Environmental Protection. (2021, November 18). 2022–2024 Conservation and Load Management Plan – Technical Meeting Presentation. <https://portal.ct.gov/-/media/DEEP/energy/ConserLoadMgmt/20211118-CLM-Technical-Meeting.pdf>; Connecticut Department of Energy & Environmental Protection. (2024). Plan Update Approval With Conditions of the 2024 Conservation and Load Management Plan Update (final determination). <https://portal.ct.gov/-/media/deep/energy/conserloadmgmt/clm-plan-update-2022-2024/2024-plan-update-final-determination.pdf>

⁶⁵ Connecticut Department of Energy & Environmental Protection. (n.d.). Equitable Energy Efficiency (E3). <https://portal.ct.gov/deep/energy/conservation-and-load-management/equitable-energy-efficiency>; Connecticut Department of Energy & Environmental Protection. (2021). Equitable Energy Efficiency – Phase I Determination. <https://portal.ct.gov/-/media/DEEP/energy/ConserLoadMgmt/Final-E3-Phase-I-Determination.pdf>; Connecticut Department of Energy & Environmental Protection. (2025). The Office of Affordable Housing Energy Retrofits Annual Report. https://portal.ct.gov/-/media/deep/energy/aher/aher-legislative-report_2025.pdf

⁶⁶ Connecticut Department of Administrative Services. (2025). Digest of Administrative Reports to the Governor, FY 2024–2025 – Department of Energy and Environmental Protection Section. Connecticut Department of Energy and Environmental Protection. (2024). 2025 Office of Affordable Housing Energy Retrofits (AHER) legislative report. https://portal.ct.gov/-/media/deep/energy/aher/aher-legislative-report_2025.pdf?rev=a22c70fd4f814ea58905acbbe2d4ab23&hash=7287D-483D66ECCDD839D45BB58A54CCA



engagements has informed proposed changes and enhancements to CT DEEP's multifamily strategy, including seeking to establish pathways for predevelopment funding and flexible financing to address common barriers like health and safety issues, structural repair needs, and inadequate wiring and electrical panels.⁶⁷

Why It Matters for NOAH Multifamily Properties: For cities like Bridgeport, this energy-housing collaborative framework has implications for how five-plus-unit NOAH multifamily buildings are identified, prioritized, and supported. In a city where a large share of affordable housing is in older multifamily buildings, and only a fifth of these units are formally subsidized, relying strictly on participation in federal or state housing subsidy programs to determine eligibility would overlook a substantial portion of the city's affordable housing inventory. By instead using an income- and rent-based criteria and explicitly targeting distressed and environmental justice communities through its CLM umbrella and E3 framework, CT DEEP is positioned to systematically direct resources toward the older five-plus-unit properties that are most at risk of sustained disinvestment or repositioning to market-rate rents that are unaffordable to a large share of renters in cities like Bridgeport.

Within this context, AHER's roundtables and working groups center on the needs, responsibilities, and limitations of owners and residents in program design and continuous improvement. CT DEEP is also extending this collaborative framework model to other initiatives that align with its broader multifamily program infrastructure, including the New England Heat Pump Accelerator, a \$450 million market transformation initiative that aims to drive heat pump adoption through a combination of manufacturer incentives and implementation, engagement, and workforce training grants. CT DEEP is administering the program on behalf of a five-state New England coalition and has included a specific working group for multifamily housing with representatives from housing agencies, tenant organizations, developers, and non-profit organizations from cities across the state, including Bridgeport.⁶⁸

Key Takeaways

For the city's older multifamily housing stock, this collaborative engagement and strategic alignment increase the likelihood that state retrofit and rehabilitation financing programs will reflect Bridgeport's specific ownership needs and constraints, property conditions, and capital requirements while remaining sensitive to tenant vulnerabilities. This holistic approach to program design is intended to advance long-term climate and housing affordability goals, reduce the risk that undercapitalized properties in low-income areas will fall through program gaps, and provide tenants with a forum for participatory governance. As Connecticut's multifamily platform expands and matures, five-plus-unit NOAH buildings in cities like Bridgeport are likely to not only serve as early beneficiaries, but also as proving grounds for program models that align state energy, housing, and finance agencies with community-level stakeholders through sustained and meaningful engagement.

⁶⁷ Connecticut Department of Energy & Environmental Protection. (2026, March 18). DEEP Announces RFI and Informational Meeting on Affordable Multifamily Revolving Loan Program. <https://portal.ct.gov/deep/news-releases/news-releases---2026/deep-announces-rfi-and-informational-meeting-on-affordable-multifamily-revolving-loan-program>

⁶⁸ Connecticut Department of Energy & Environmental Protection. (n.d.). New England Heat Pump Accelerator. <https://portal.ct.gov/deep/energy/new-england-heat-pump-accelerator>



CASE STUDY 3: Low-Income Energy Affordability Network (LEAN) Multifamily | Boston, MA

Featured Best Practice: State Capacity Support for Locally Embedded Delivery Networks

Program Structure and Governance: The Massachusetts program administrators, comprised of investor-owned utilities and the Cape Light Compact (a small, regional public energy service) and the state's Department of Energy Resources (DOER) are the primary administrators of low-income and income-eligible multifamily efficiency programs that operate under the statewide energy efficiency initiative, Mass Save.⁶⁹

Under Mass Save, the Income Eligible Multifamily Retrofit (IEMF) program operates the Low-Income Energy Affordability Network (LEAN). The program is implemented through a network of locally embedded Community Action Programs (CAPs), including Action for Boston Community Development (ABCD).⁷⁰ Implementors like ABCD coordinate building audits, program delivery, inspections, and incentive and loan payments for income-qualifying multifamily properties of five or more units.⁷¹ DOER complements the work of the CAPs with flexible capital and tailored support through the Affordable Housing Decarbonization Grant and Technical Assistance Program, which funds and supports substantial retrofit projects, including building electrification and solar projects.⁷²

The City of Boston's role in reaching NOAH owners has recently expanded with the Boston Energy Saver program. Launched in 2025, this initiative provides technical assistance in a variety of languages for renters and small landlords and specifically targets buildings in designated equity tracts with the goal of connecting these harder-to-reach populations to Mass Save weatherization and electrification resources.⁷³ In the Boston metropolitan area, this state-to-local infrastructure is complemented by a robust ecosystem of community development corporations (CDCs) and community development finance institutions (CDFIs) working proactively to preserve unsubsidized affordable properties through innovative financing and acquisition/preservation strategies.⁷⁴ Together, these players form a layered program governance and delivery system that aligns state programs, enhanced support through DOER grants and technical assistance, and community-level outreach that is underpinned by local CDC/CDFI preservation strategies.

⁶⁹ Mass Save. (2026). Income Eligible Programs. <https://www.masssave.com/residential/rebates-offers-services/income-based-offers/income-eligible-programs>; Mass Save. (n.d.). Multi-Family – Mass Save. <https://www.masssave.com/multi-family>

⁷⁰ Low-Income Energy Affordability Network. (2026). LEAN Multifamily Program. <https://leanmultifamily.org>; Low-Income Energy Affordability Network. (2019, October 7). Mass Save Low-Income Multi-Family Retrofits (Program Guide). <https://leanmultifamily.org/wp-content/uploads/2019/10/LIMF-Program-Guide-Final-10.7.19.pdf>

⁷¹ Action for Boston Community Development. (2024, December 10). Massachusetts' Low-Income Energy Affordability Network Lauded by ACEEE as a National Leader in Energy Affordability Initiatives. Action for Boston Community Development. <https://bostonabcd.org/2024/12/10/massachusetts-low-income-energy-affordability-network-lauded-by-aceee-as-a-national-leader-in-energy-affordability-initiatives/>

⁷² Massachusetts Department of Energy Resources. (2023). Affordable Housing Decarbonization Grant Program. <https://www.mass.gov/info-details/affordable-housing-decarbonization-grant-program>; Massachusetts Department of Energy Resources. (2025). Affordable Housing Decarbonization Technical Assistance Program. <https://www.mass.gov/info-details/affordable-housing-decarbonization-technical-assistance-program>

⁷³ City of Boston. (2025, October 28). Mayor Michelle Wu Announces New Boston Energy Saver Program to Help Boston Residents Upgrade Their Buildings and Lower Energy Bills. <https://www.boston.gov/news/mayor-michelle-wu-announces-new-boston-energy-saver-program-help-boston-residents-upgrade>; City of Boston. (2026). Boston Energy Saver. <https://www.boston.gov/departments/environment/boston-energy-saver>

⁷⁴ Massachusetts Association of Community Development Corporations. (2025). Here Today, Here Tomorrow: CDC Acquisition of Naturally Occurring Affordable Housing. The Boston Foundation. <https://www.tbf.org/news-and-insights/reports/2025/december/noah-report-macdc>



Challenges and Opportunities: Massachusetts has one of the highest rental affordability gaps in the nation. In 2025, the statewide wage needed to afford a two-bedroom apartment was nearly \$46 per hour, well above typical pay for low- and moderate-income renters.⁷⁵ There are approximately 194,000 occupied rental units in the city with around 51 percent in buildings with five or more apartments. Approximately 29 percent of the city's affordable units are formally subsidized, but around half of all renters are cost burdened, meaning they spend more than 30 percent of their income on rent.⁷⁶ Historically, roughly half of the total rental stock in Boston was unsubsidized yet considered affordable to low- and moderate-income residents, but this inventory is rapidly disappearing as rental prices in the city have rapidly appreciated in recent years.⁷⁷

A 2025 analysis by the Massachusetts Association of Community Development Corporations (MACDC) noted that multifamily rental properties in greater Boston are under intense pressure from speculative investors and often require significant capital investment to address deferred maintenance, structural repairs, and inadequate or obsolete electrical systems before energy efficiency projects can move forward.⁷⁸ Mass Save program evaluations indicate that small market-rate multifamily properties, defined as between three and 20 units, face distinct barriers including difficulties navigating program information, limited access to capital, and a tendency to prioritize competing maintenance and repair needs over energy efficiency upgrades.⁷⁹

Boston's Building Emissions Reduction and Disclosure Ordinance (BERDO) adds an additional layer of complexity for a small subset of NOAH owners.⁸⁰ The ordinance establishes emissions limits for residential buildings of more than 15 units or 20,000 square feet, including parcels with multiple buildings that meet these unit and square footage thresholds. Emissions limits began to be enforced for larger buildings in the city in 2025 and will extend to all covered residential properties by 2030.⁸¹ The city is proactively working to support these owners in meeting BERDO's requirements with free technical assistance, compliance planning, and a streamlined hardship compliance pathway, and many NOAH properties in Boston fall below the covered building threshold.⁸² Nonetheless, capital constrained owners of older midsize properties will face the additional pressure of complying with forthcoming emissions caps, underscoring the need for actionable

⁷⁵ National Low Income Housing Coalition. (2026). Massachusetts Housing Profile. https://nlihc.org/sites/default/files/SHP_MA.pdf; Massachusetts Housing Partnership & Metropolitan Area Planning Council. (2025, April 23). Data Opens Doors: Measuring the Affordable Housing Gap in Massachusetts. https://www.mapc.org/wp-content/uploads/2025/04/Data-Opens-Doors-Report_-04.23.25.pdf

⁷⁶ City of Boston, Mayor's Office of Housing. (2024, August). Income-Restricted Housing in Boston 2024. <https://www.boston.gov/sites/default/files/file/2025/08/Income-Restricted%20Housing%20-%202025%20Final.pdf>

⁷⁷ Massachusetts Association of Community Development Corporations. (2025, December 16). CDC Acquisition of Naturally Occurring Affordable Housing. The Boston Foundation. <https://www.tbf.org/news-and-insights/reports/2025/december/noah-report-macdc>

⁷⁸ Massachusetts Association of Community Development Corporations. (2025, December 16). CDC Acquisition of Naturally Occurring Affordable Housing. The Boston Foundation. <https://www.tbf.org/news-and-insights/reports/2025/december/noah-report-macdc>

⁷⁹ Guidehouse Inc. (2022). Small Multifamily Barriers Study (MA21R36-B-MFB). The Electric and Gas Program Administrators of Massachusetts. https://ma-eeac.org/wp-content/uploads/MA21R36-B-MFB-Small-MF-Barriers_Report_FINAL_11MAR2022.pdf

⁸⁰ Facilities Dive. (2024, August 22). What to Know About BERDO, Boston's Building Performance Standards Law. <https://www.facilitiesdive.com/news/what-to-know-about-berdo-bostons-building-performance-standards-law/725082/>

⁸¹ City of Boston. (2024). BERDO 101: Building Emissions Reduction and Disclosure Ordinance Basics. https://www.boston.gov/sites/default/files/berdo/BERDO_Basics.pdf; City of Boston. (2023). Building Emissions Reduction and Disclosure Ordinance (BERDO) – Covered Buildings Dataset. <https://data.boston.gov/dataset/building-emissions-reduction-and-disclosure-ordinance>

⁸² City of Boston Environment Department. (2026). Building Emissions Reduction and Disclosure (BERDO). City of Boston. <https://www.boston.gov/departments/environment/berdo>



pathways to retrofit program financing and implementation support.⁸³

How the Program Works: The Mass Save Income Eligible Multifamily (IEMF) Retrofit program serves properties with five or more units where at least 50 percent of households are at or below 60 percent of AMI.⁸⁴ Eligible owners include both non-profit and private entities, and services are delivered at little or no cost for qualifying properties. The full suite of program measures includes prescriptive upgrades like lighting, some appliances, and basic air sealing, and custom measures including boiler and domestic hot water system replacements, air source heat pumps, insulation, ventilation improvements, and building controls.⁸⁵ All program offerings are subject to Mass Save's efficiency ratings, quality standards, and cost effectiveness criteria. In the current 2025-2027 three-year plan, the statewide Mass Save portfolio is forecast to deliver approximately \$2.70 in customer benefits for every dollar invested, and low-income and income-eligible programs, including IEMF, contribute to this overall benefit-cost performance.⁸⁶ To shield residents from rent increases after energy upgrades have been completed, for-profit owners must agree to preserve the 50 percent of households at 60 percent AMI affordability parameters for between five and 10 years depending on property size.⁸⁷ The program offers multiple program pathways depending on the building's needs, including a deep energy retrofit (DER) pathway for projects expected to reduce site energy use intensity by at least 40 percent.⁸⁸

A central feature of the IEMF model is its reliance on community-based CAP agencies like ABCD in Boston.⁸⁹ Supported by LEAN, these agencies work with Mass Save program administrators like Eversource, overseeing outreach, building assessments, contractor selection, program delivery, and quality assurance. The program administrators provide funding, program design oversight, data and reporting infrastructure, and oversight of regulatory compliance. The local CAP agencies then direct and manage these resources to eligible multifamily buildings within their geographic coverage area.⁹⁰ This framework operationalizes the community engagement best practice of connecting with organizations and individuals with existing relationships in low-income communities. This ongoing local presence allows CAPs like ABCD to streamline program access and provide guidance to multifamily owners that may otherwise be unaware of or unable to navigate Mass Save programs.

⁸³ City of Boston. (2025, March 11). BERDO Webinar: 2025 Reporting and Emissions Compliance. https://www.boston.gov/sites/default/files/file/2025/03/3.12.25%20BERDO%20Webinar%20Launch%20of%202025%20Reporting%20and%20Emissions%20Compliance_0.pdf; City of Boston. (2026, March 18). BERDO Webinar: 2026 Flexibility Measures. <https://www.boston.gov/sites/default/files/file/2026/03/Flexibility%20Measure%20Webinar%20-%202003.18.26.pdf>

⁸⁴ LEAN Multi-Family. (2025, May 29). IEMF Program Guide. <https://leanmultifamily.org/wp-content/uploads/2025/11/IEMF-Program-Guide-5-29-25.pdf>; Mass Save. (2025). Income Eligible Programs. <https://www.masssave.com/residential/rebates-offers-services/income-based-offers/income-eligible-programs>

⁸⁵ LEAN Multifamily. (2025, May 29). IEMF Program Guide. <https://leanmultifamily.org/wp-content/uploads/2025/11/IEMF-Program-Guide-5-29-25.pdf>; Mass Save. (2025). Multi-Family Energy Efficiency Saving Assessments. <https://www.masssave.com/multi-family/energy-assessments/multi-family-facilities-5-units-plus>

⁸⁶ Massachusetts Program Administrators. (2023). The Massachusetts 2025–2027 Energy Efficiency and Demand Reduction Plan. <https://ma-eeac.org/wp-content/uploads/Final-Draft-MA-2025-2027-Plan-04-01-24.pdf>; Metropolitan Area Planning Council. (2025). What's New and What Was Left Out of the Mass Save Three-Year Plan (2025–2027). <https://www.mapc.org/planning101/mass-save-three-year-plan-25-27/>; Acadia Center. (2026). Mass Save Program Value and Benefit-Cost Performance [policy brief]. <https://acadiacenter.org/house-democrats-move-to-slash-mass-save-budget-in-sweeping-energy-package-designed-to-lower-utility-bills/>

⁸⁷ LEAN Multifamily. (2025, May 29). IEMF Program Guide. <https://leanmultifamily.org/wp-content/uploads/2025/11/IEMF-Program-Guide-5-29-25.pdf>

⁸⁸ LEAN Multi-Family. (2024, May 13). DER FAQs May 2024. <https://leanmultifamily.org/wp-content/uploads/2024/05/DER-FAQs-5-13-2024.pdf>

⁸⁹ Action for Boston Community Development. (2025). Energy Services for Multi-Family Buildings. <https://bostonabcd.org/service/conservation-ncap/>

⁹⁰ Mass Save. (2024, October 31). 2025–2027 Massachusetts Joint Statewide Three-Year Energy Efficiency Plan. <https://masssave.com/>; LEAN Multifamily. (2025, May 29). IEMF Program Guide. <https://leanmultifamily.org/wp-content/uploads/2025/11/IEMF-Program-Guide-5-29-25.pdf>



At the city level, the recently launched Boston Energy Saver program serves as a coordinated front end for small landlords to receive multilingual support for accessing federal, state, utility, and city incentives. This initiative aims to direct \$300 million in state benefits into the city to fund 5,000 air source heat pumps and weatherize 10,000 buildings by 2027.⁹¹ The program prioritizes outreach to Boston’s designated equity communities and has a particular focus on smaller multifamily buildings and renters who have historically faced barriers to accessing city programs.⁹² The city works toward Energy Saver’s goals in alignment with the Mass Save Community First Partnership, a utility-sponsored outreach and education initiative intended to drive enrollment in Mass Save’s programs.⁹³

Why It Matters for NOAH Multifamily Properties: IEMF’s baseline program eligibility rules allow any property with five or more units where at least half of the households earn at or below 60 percent of AMI, which means that older, unsubsidized buildings in Boston’s low-income neighborhoods can qualify for services, provided that owners are willing to sign an affordability preservation agreement.⁹⁴ An analysis by the Building Electrification Institute demonstrated that more than half of Boston’s small to medium multifamily buildings are strong candidates for common retrofit packages including attic and wall insulation and heat pumps, that many of these properties would require electrical service upgrades, and that these opportunities cluster in neighborhoods where low-income households, renters, and community members with limited English proficiency are overrepresented.⁹⁵

Key Takeaways

Massachusetts’ multifamily program framework connects this potential for efficiency upgrades and related improvements in tenant health and safety to state resources via embedded local networks and streamlined program delivery. Outreach initiatives like Boston Energy Saver and Community First Partnerships provide neighborhood-level engagement, education, and multilingual support, and the LEAN to ABCD pipeline serves as a single point of contact that helps owners determine project scope, connect with reputable contractors, and navigate the program’s application and reporting requirements. Mass Save’s program design best practices are intended to

FEATURED BEST PRACTICE: LOCALLY EMBEDDED DELIVERY

Massachusetts shows how statewide funding can be translated into practical project delivery through locally embedded organizations. CAP agencies such as ABCD help owners navigate audits, contractors, incentives, inspections, and paperwork, reducing the transaction costs that often prevent smaller multifamily owners from participating.

⁹¹ Mayor’s Office of Media Relations. (2025, October 29). Mayor Michelle Wu Announces New Boston Energy Saver Program to Help Boston Residents Upgrade Their Homes and Save Money. <https://www.boston.gov/news/mayor-michelle-wu-announces-new-boston-energy-saver-program-help-boston-residents-upgrade>

⁹² City of Boston. (n.d.). Boston Energy Saver. <https://boston.gov>

⁹³ City of Boston. (2022, April 25). Docket 0539: Order Authorizing the City of Boston to Accept and Expend Community First Partnership Funds. https://www.boston.gov/sites/default/files/file/2022/05/Docket%200539_0.pdf

⁹⁴ LEAN Multifamily. (2025, May 29). IEMF Program Guide. <https://leanmultifamily.org>; Mass Save. (2025). Income Eligible Programs. <https://masssave.com>

⁹⁵ Building Electrification Institute. (2021). Boston Building Electrification Profile: Small-to-Medium Multifamily Buildings. <https://beicities.org>



minimize owner out-of-pocket expenses, provide rent increase protection for tenants, and create a practical pathway for income-eligible properties, including those covered by BERDO.⁹⁶ This state-to-local support framework makes energy efficiency upgrades in the city’s NOAH properties achievable for owners who would otherwise not be able to navigate the complex process of retrofitting a multifamily building.

CASE STUDY 4: MEEHA as a Multifamily Retrofit and Affordability Platform | Maryland

Featured Best Practice: State Housing and Energy Agency Collaboration

Program Structure and Governance: Maryland’s Multifamily Energy Efficiency and Housing Affordability (MEEHA) Program provides grants and loans to qualifying multifamily property owners and uses EmPOWER Maryland as an important funding source within the broader program structure.⁹⁷ The MEEHA Program works in partnership with the state’s ratepayer-funded energy efficiency and electrification portfolio, EmPOWER Maryland, and the complementary Greenhouse Gas Reduction Program (GHGRP).⁹⁸ These programs provide loans, grants, and other incentives that can be used to retrofit existing multifamily buildings where a share of units are affordable to renters with low incomes.⁹⁹

At the community level, the Department of Housing and Community Development (DHCD)-Baltimore City maintains an Affordable Housing Inventory that categorizes subsidized and unsubsidized affordable units to direct the appropriate state and local resources needed to stabilize and improve the city’s aging rental housing stock.¹⁰⁰ Regional utilities, including BGE and Washington Gas, administer EmPOWER Maryland efficiency offerings and coordinate with DHCD’s MEEHA and related programs, while DHCD oversees MEEHA’s multifamily loan and grant platform. Program grants and loans are awarded directly to property owners, who retain qualified energy professionals to conduct energy audits and prepare MEEHA applications. Owners typically select their own contractors to perform the work, and the Qualified Energy Professional may or may not serve as the installation contractor.¹⁰¹

⁹⁶ LEAN Multifamily. (2025, May 29). IEMF Program Guide. <https://leanmultifamily.org>; City of Boston. (n.d.). BERDO: Building Energy Reporting and Disclosure Ordinance. <https://boston.gov>

⁹⁷ Maryland Energy Administration. (2025). Multifamily Buildings. <https://energy.maryland.gov/Pages/MultifamilyBuildings.aspx>; Maryland Department of Housing and Community Development. (2025, January 7). Maryland Department of Housing and Community Development Releases Agency Climate Plan to Meet Greenhouse Gas Reduction Targets. <https://news.maryland.gov/dhcd/2025/01/07/maryland-department-of-housing-and-community-development-releases-agency-climate-plan-to-meet-greenhouse-gas-reduction-targets/>

⁹⁸ Maryland Office of People’s Counsel. (2024). EmPOWER Programs. <https://opc.maryland.gov/Consumer-Learning/Energy-Bill-Savings/EmPOWER-Programs>; Maryland Department of Housing and Community Development. (2024). Multifamily Energy Efficiency and Housing Affordability (MEEHA) Program. <https://dhcd.maryland.gov/Energy-Home-Repair/pages/multifamily-energy-program/meeha.aspx>

⁹⁹ Maryland Department of Housing and Community Development. (2026, January 1). 2026 MEEHA Program Guidance. <https://dhcd.maryland.gov/Energy-Home-Repair/Documents/MEEHA/Program-Guide.pdf>

¹⁰⁰ Baltimore City Department of Housing and Community Development. (2025). Affordable Housing Inventory. <https://www.baltimorecity.gov/dhcd/our-work/neighborhood-development/affordable-housing-inventory>

¹⁰¹ Maryland Energy Administration. (2025). Multifamily Buildings. <https://energy.maryland.gov/Pages/MultifamilyBuildings.aspx>



Challenges and Opportunities: Baltimore’s five-plus multifamily buildings contain around 114,000 units, roughly 35 percent of which are formally subsidized.¹⁰² Between 24,000 and 29,000 of these units are in market-rate buildings that are unsubsidized but affordable to households at or below 80 percent AMI, representing approximately one-fifth of the city’s total rental inventory. Many of these properties are in areas of the city with high concentrations of Black households and low-income renters.¹⁰³

The median home age in Baltimore’s housing stock is 75 years, the third oldest in the United States, and around 42 percent of its total housing inventory was built before 1940.¹⁰⁴ Many of the city’s five-plus NOAH properties are older garden-style communities and mid-rise buildings with obsolete mechanical systems and wiring, old windows, inadequate weatherization, and deferred repairs.¹⁰⁵ These conditions also result in higher-than-average energy burdens for residents and make energy efficiency upgrades or building retrofits difficult for owners to finance without flexible external capital.¹⁰⁶ Preserving NOAH multifamily properties in Baltimore increasingly depends on the ability of small property owners and emerging developers to be able to reinvest in their buildings without passing costs along to their cost-burdened tenants in a city where half of renter households are cost burdened and renter poverty rates are among the highest in the state of Maryland.¹⁰⁷

How the Program Works: The MEEHA EmPOWER Program provides grants and loans to income-qualifying multifamily properties across the state of Maryland. Financing can be used for building envelope improvements, HVAC and domestic hot water systems, lighting, appliances, and weatherization, and the program explicitly prefers electrification over new fossil fuel systems.¹⁰⁸ EmPOWER features two tiered pathways with similar measures. Although Tier 1 offers lower project incentives, owners who choose this pathway still qualify for additional financing and incentives to support comprehensive retrofit project scopes. Tier 2 offers higher per-measure caps for equipment, higher per-square-foot allowances for insulation and envelope improvements, and access to additional needs-based capital. Depending on the situation, owners

¹⁰² U.S. Census Bureau. (2023). 2018–2022 American Community Survey 5-Year Estimates: Units in Structure by Tenure (Baltimore City, Maryland). Washington, DC: U.S. Census Bureau. <https://www.census.gov/programs-surveys/acs.html>; U.S. Department of Housing and Urban Development, Office of Policy Development and Research. (2023). Baltimore–Columbia–Towson, Maryland: Housing Market Profile. Washington, DC: U.S. Department of Housing and Urban Development. <https://www.huduser.gov/portal/publications/pdf/BaltimoreColumbiaTowsonMD-CHMA-23.pdf>; Housing Authority of Baltimore City. (2024). Fiscal Year 2023 Moving to Work Annual Report. Housing Authority of Baltimore City. <https://www.hud.gov/sites/dfiles/PIH/documents/BaltimoreFY24Plan.pdf>

¹⁰³ Maryland Department of Housing and Community Development & National Center for Smart Growth. (2025). 2025 Maryland Housing Needs Assessment: Housing Gaps Analysis and Housing Needs Assessment of Older Adults. <https://dhcd.maryland.gov/Documents/Research/Compiled-Report-SHNA-2025.pdf>

¹⁰⁴ Citybiz. (2022, August 22). Baltimore Has the 3rd Highest Median Home Age in the U.S. <http://www.citybiz.co/article/311527/baltimore-has-the-3rd-highest-median-home-age-in-the-u-s/>; Maryland Department of Housing and Community Development. (2025). Maryland Housing Needs Assessment Update: Statewide and Local Summaries. <https://dhcd.maryland.gov/Documents/Research/Compiled-Report-SHNA-2025.pdf>

¹⁰⁵ U.S. Department of Housing and Urban Development. (2021). Baltimore–Columbia–Towson, Maryland Comprehensive Housing Market Analysis. <https://www.huduser.gov/portal/publications/pdf/BaltimoreColumbiaTowsonMD-CHMA-21.pdf>

¹⁰⁶ Elevate. (2018). Making Naturally Occurring Affordable Housing More Efficient. <https://www.elevatenp.org/wp-content/uploads/Making-Naturally-Occurring-Affordable-Housing-More-Efficient.pdf>; Harvard Joint Center for Housing Studies. (2016). Reducing Energy Costs in Rental Housing. https://www.jchs.harvard.edu/sites/default/files/carliner_research_brief_0.pdf

¹⁰⁷ Maryland Department of Housing and Community Development & National Center for Smart Growth. (2025). Maryland Housing Needs Assessment Update: Statewide and Local Summaries. <https://dhcd.maryland.gov/Documents/Research/Compiled-Report-SHNA-2025.pdf>

¹⁰⁸ Maryland Department of Housing and Community Development. (2026). MEEHA EmPOWER Multifamily Energy Efficiency and Housing Affordability Program Guide. <https://dhcd.maryland.gov/Energy-Home-Repair/Documents/MEEHA/Program-Guide.pdf>



may request up to 10 percent of the total project amount for building repairs and health and safety work. This allocation is not intended to cover broad, standalone remediation work, but rather the repairs necessary to install or protect funded measures, e.g., patching a wall opening left after replacing a through-the-wall air conditioning unit.¹⁰⁹

Any multifamily project with 20 percent of units at or below 80 percent of AMI can participate in the EmPOWER Program. For multifamily buildings over 35,000 square feet, or campus style properties of two or more buildings that exceed this per-square-foot threshold, MEEHA's Greenhouse Gas Reduction Program (GHGRP) layers additional financing for electrification work that supports property owner compliance with Maryland's Building Energy Performance Standard (BEPS) ordinance. GHGRP requires properties to meet a slightly stricter definition of affordable housing of at least 51 percent of units at or below 80 percent AMI. Smaller NOAH properties do not qualify for funding through GHGRP and are instead served by the core EmPOWER program.¹¹⁰

MEEHA also includes provisions to prevent rent increases after building upgrades are complete. Properties that participate in the Tier 1 pathway must maintain 20 percent of units at 80 percent AMI for five years. For participants in the Tier 2 pathway, the 20 percent / 80 percent affordability period is 15 years. Similarly, large buildings funded by GHGRP must agree to maintain a 15-year affordability term for the 51 percent / 80 percent AMI tenant income mix needed to qualify for the program. During the compliance period, DHCD monitors properties to confirm that affordability commitments are maintained, ensuring owners are accountable and public investments in efficiency and electrification benefit low-income renters without contributing to rent increases or displacement.¹¹¹

Why It Matters for NOAH Multifamily Properties: Although MEEHA is oriented toward subsidized affordable properties that qualify for additional funding through mechanisms like Low-Income Housing Tax Credits (LIHTC), the program's flexible affordability thresholds, ability to fund predevelopment and pre-weatherization needs, and embedded tenant protections make it an actionable tool for funding retrofits in NOAH multifamily buildings. For multifamily properties with five or more units in Baltimore, where many unsubsidized properties are characterized by disinvestment, physical deterioration, and outdated building systems, MEEHA offers a pathway to stabilizing a property rather than allowing it to deteriorate to the point of being unfit for habitation.

MEEHA plays a central role in addressing the high upfront costs of significant retrofit and electrification projects, a key barrier for five-plus-unit NOAH properties with limited access to capital. By providing generous per-unit incentives for equipment and per-square-foot allowances for insulation and building envelope work, along with access to flexible capital for incidental repairs and health and safety work that is not covered by

¹⁰⁹ Maryland Department of Housing and Community Development. (2026). MEEHA EmPOWER Multifamily Energy Efficiency and Housing Affordability Program Guide. <https://dhcd.maryland.gov/Energy-Home-Repair/Documents/MEEHA/Program-Guide.pdf>

¹¹⁰ Maryland Department of Housing and Community Development. (2026). MEEHA Greenhouse Gas Reduction Program (GHGRP) and EmPOWER Multifamily Program Guidance. <https://dhcd.maryland.gov/Energy-Home-Repair/Documents/MEEHA/Program-Guide.pdf>

¹¹¹ Maryland Department of Housing and Community Development. (2026). MEEHA and Greenhouse Gas Reduction Program (GHGRP) and EmPOWER Multifamily Program Guidance. <https://dhcd.maryland.gov/Energy-Home-Repair/Documents/MEEHA/Program-Guide.pdf>



the program's core incentives, MEEHA makes it easier for NOAH multifamily owners to undertake ambitious, comprehensive retrofit projects.

Maryland's broader energy efficiency portfolio, including Maryland Energy Administration initiatives and utility programs, complements MEEHA by supporting related efficiency and electrification goals, but this case study focuses primarily on DHCD's multifamily loan and grant platform. The way MEEHA is structured to improve the health, safety, and comfort of residents while preserving affordable housing stock illustrates the potential of aligning energy efficiency investments with housing preservation objectives, particularly in cities like Baltimore where many small and medium-size multifamily buildings are owned by firms with limited capital and technical capacity.

Key Takeaways

The Multifamily Energy Efficiency and Housing Affordability (MEEHA) Program is Maryland's central platform for delivering efficiency and electrification funding to multifamily properties, with EmPOWER Maryland functioning as a major funding source within that platform rather than as a separate standalone program. MEEHA is structured to serve older, undercapitalized buildings by combining grants and loans that can cover expensive upgrades like major building system replacements or building envelope improvements. These programs make comprehensive retrofit scopes more feasible for small and mid-size multifamily owners, including owners of naturally occurring affordable housing in disinvested neighborhoods. Program funds flow directly to property owners, who retain control over project decisions while receiving technical support through qualified energy professionals for energy audits, application development, and project design, with owners given the flexibility to select their own contractors for implementation. The program also allows a defined share of funding to be used for incidental repairs and health and safety work needed to enable energy efficiency measures, which helps prevent projects in older buildings from being delayed or deferred from the program altogether. At the same time, MEEHA links energy investment to affordable housing preservation through rent and income commitments tied to funding, aligning retrofit activity with longer-term affordability goals for multifamily properties, including unsubsidized affordable apartment buildings in Baltimore that may otherwise face disinvestment or gentrification.



Lessons From Regional Programs: Case Study Synthesis and Best Practices

The examples of New York, Connecticut, Massachusetts, and Maryland demonstrate that programs are increasingly recognizing that reaching unsubsidized affordable multifamily housing will require adapting to the distinct needs of NOAH buildings, owners, and tenants. Across these four state program examples, several promising practices emerge that can drive greater program uptake at NOAH multifamily properties. These include:

Emerging Best Practices From Regional Multifamily Retrofit Programs		
 Streamlined Eligibility	 Local Outreach and Technical Assistance	 Predevelopment Capital
 Flexible Funding for Enabling Repairs	 Tenant Protections	 Energy-Housing-Finance Coordination

- **Streamlined procedures for verifying property eligibility** including determining resident household income using rent-roll data and verification of a property’s affordability status through owner attestation. Adjusting program eligibility guidelines to allow NOAH properties to more easily qualify for state and utility multifamily programs is critical for addressing the sector at scale. Requiring household income documentation to be verified on a unit-by-unit basis is difficult for capacity-constrained property owners and managers. Applying a standard assumption to estimate tenant income levels reduces administrative burden, shortens the program application timeline, and makes it feasible for low-capacity owners to participate without having to manage intrusive and time-consuming tenant data collection initiatives.
- **Locally embedded outreach and easy to access technical assistance** including multilingual outreach and end-to-end program navigation. Program models that leverage existing local networks to deliver technical assistance and program navigation support, including CAP agencies, city-led initiatives, and community development organizations, allow state programs to channel investments to the properties that are most in need of assistance. This helps small and midsize property developers, a key target population for compliance with state and municipal building emissions standards, to overcome barriers to participation.
- **Predevelopment capital** including access to grants, forgivable loans, and flexible low-risk capital—another essential strategy for driving program uptake in NOAH multifamily. Many properties, particularly the older, capital constrained, and disinvested buildings that are common in the unsubsidized affordable rental market, require access to upfront capital for feasibility studies, energy audits, site assessments, and early-stage project coordination. Without access to predevelopment funding, many owners will be unable to move retrofit projects forward, even when there is clear potential to reduce energy use and preserve affordable units.



- **Comprehensive coverage for measures** including health and safety barrier remediation, electrical panel upgrades, and building repairs to enable energy efficiency upgrades—another key practice from the case study examples. By incorporating flexible, strategically deployed funding to ensure multifamily retrofit projects can move through the project pipeline without encountering barriers, programs reduce deferrals and ensure that owners receiving state and utility resources are not forced to compromise on energy efficiency, or abandon projects altogether, due to a lack of funding.¹¹²
- **Embedded tenant protections** including restrictions on post-retrofit rent increases or property sales—a key best practice for preventing tenant disruption and displacement and preserving affordable housing inventory. Requiring landlords to agree to limiting rent increases as a condition of program participation ensures that ratepayer funded programs do not accelerate the loss of affordable housing and energy efficiency programs provide long-term benefits for low-income renters. Aligning affordability agreement terms with the amount of funding a property receives ensures owners who enroll in retrofit programs are not disproportionately overburdened by post-upgrade affordability requirements.

Retrofit Program Recommendations for State and Utility Multifamily Administrators

Based on the case studies, the following actions can help state agencies, utilities, and multifamily program administrators better reach NOAH multifamily properties and improve retrofit outcomes.

- **Explicitly recognize NOAH in program design.** Establish a formal definition of unsubsidized low-income rental properties for multifamily program guidelines, implementation strategies, and planning documents, identifying NOAH as a distinct market segment of the broader multifamily portfolio.
- **Apply streamlined eligibility pathways.** Where unit by unit income verification is a barrier, allow eligibility determinations based on rent-roll analysis, fair market rent proxies, HUD data, or similar methods that reduce administrative burden for small and mid-size owners while still preserving program integrity.
- **Provide end-to-end technical assistance for owners.** Offer support that covers the full retrofit process, including initial feasibility studies, energy audits, scope development, incentive and financing coordination, and contractor management, with particular attention to owners of smaller and capacity-constrained NOAH properties.
- **Sequence incentives to reflect project cash-flow needs.** Structure incentive payments so that

¹¹² E4TheFuture. (2022). Weatherization Barriers Toolkit (Case Study: Connecticut Weatherization Barriers Remediation Program). https://e4thefuture.org/wp-content/uploads/2022/04/E4-EFG_Weatherization-Barriers-Toolkit-4-7-2022.pdf; Residential Energy Preparation Services (REPS) – CT DEEP. (2025). Weatherization Barrier Mitigation Overview. <https://portal.ct.gov/deep/energy/conservation-and-load-management/weatherization-barrier-mitigation>; Connecticut Department of Energy and Environmental Protection. (2026). Multifamily Revolving Loan Program: Proposed Design [presentation]. <https://portal.ct.gov/-/media/deep/energy/aher/rf-gf-rfi-informational-meeting-pres.pptx>



funds can be issued at key project milestones rather than only after final completion. This can make comprehensive retrofit projects more feasible by reducing the need for owners to carry project costs for extended periods while incentives are being processed.

- **Pair incentives with flexible capital for predevelopment and enabling work.** Combine incentives for specific measures with grants, forgivable loans, or low-cost financing that can support audits, feasibility studies, predevelopment activities, repairs needed to enable efficiency upgrades, electrical wiring and panel upgrades, and health and safety work needed to move projects forward.
- **Align energy programs with housing and finance partners.** Establish regular coordination among energy agencies, utilities, housing departments, housing finance institutions, green banks, and community lenders so retrofit incentives can be layered with preservation financing, rehabilitation funding, and affordability tools.
- **Design electrification offerings with tenant cost impacts in mind.** Develop electrification pathways that account for whole-building operating costs and different metering structures, and ensure programs are designed with provisions to reduce the risk of cost shifting between owners and tenants and adjust program design and technical guidance to mitigate adverse bill impacts in NOAH properties.
- **Integrate tenant protections into major retrofit programs.** When significant public or ratepayer funding is provided, incorporate affordability and rent stability commitments that are consistent with state and local policy frameworks, so efficiency and electrification investments do not contribute to rent increases, displacement, or loss of lower-cost housing.
- **Strengthen data collection and reporting on NOAH outcomes.** Collect and report data that distinguish NOAH properties from subsidized affordable and market-rate multifamily buildings, so program administrators can assess whether NOAH properties are being reached. At minimum, reporting should identify affordability type, unit count, ownership profile, building age, project status, incentive amounts, installed measures, realized savings where available, and whether tenant protection or affordability commitments were required. Programs should also track whether NOAH properties are entering the pipeline, completing projects, and receiving a meaningful share of funds relative to need. Without this information, states and utilities cannot determine whether unsubsidized affordable properties are being served at scale or whether participation is concentrated in subsidized buildings that are administratively easier to reach.
- **Include preservation and equity outcomes in program assessments.** Complement traditional cost-effectiveness and savings metrics with indicators related to unit preservation, affordability, owner participation by size and capitalization, tenant impacts, and outcomes in environmental justice and disinvested communities.



Conclusion

Naturally occurring affordable housing (NOAH) multifamily properties represent a critical but often overlooked segment in efforts to advance both greenhouse gas reduction and affordable housing preservation goals. Existing program structures frequently fail to address the unique financial, operational, and technical challenges faced by these properties, limiting access to incentives, financing, and long-term support. Effectively scaling retrofit and preservation efforts will require recognizing NOAH as a distinct affordable housing category through tailored eligibility requirements, targeted technical assistance, and protections against unintended tenant cost burdens.

This paper finds that statewide multifamily energy efficiency programs can be adapted to better serve NOAH properties when they reduce owner transaction costs, allow more practical eligibility pathways, and pair technical assistance with flexible financing tools. It also finds that the strongest current examples rely on coordination across utilities, housing agencies, and financing partners rather than on a single program design. At the same time, the available evidence on the effectiveness of these approaches remains uneven. New York and Massachusetts provide the clearest early implementation lessons, while the Connecticut and Maryland examples are more useful at this stage for illustrating governance and financing approaches than for demonstrating mature outcome data. Future program design should place greater emphasis on tracking whether NOAH properties are actually being reached, how tenant protections function in practice, and whether retrofit investments preserve lower-rent housing over time.