

Written Comments in Response to the New Jersey Energy Master Plan

By Isles, Inc.

Via electronic submission to emp.comments@bpu.nj.gov

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Introduction

Isles, Inc. is a community development and environmental organization based in Trenton, New Jersey. Our mission is to foster self-reliant families and healthy, sustainable communities. We seek low-cost, high return opportunities to generate economic growth, specifically within low-income and environmental justice communities in the state.

We strive to understand and fix the systems that trap people in poverty, distress neighborhoods, and prevent communities from thriving. Through this we design and develop effective services that support our mission. As a result, we have built and renovated over 500 homes with high standards of energy efficiency, indoor air quality, and sustainability; trained and certified more than 3,500 people through our Center for Energy and Environmental Training department; remediated 320 homes to be lead-safe and healthy, protecting children from permanent lead poisoning; and established 200 community and school gardens that grow tens of thousands of fresh produce.

Recommended Provisions

Goal 3.1.2: Increase funding for, awareness of, and access to New Jersey's Clean Energy Program and its suite of statewide programs.

Recommendation:

Combine Lead, Energy, and Healthy Homes Services alongside increased funding in order to penetrate Low-Income and Environmental Justice Communities. Through the Clean Energy Program, we have trained over 570 workers under the Building Performance Institute Certification with the goal of increasing job opportunity and enabling economic growth within low-income communities. Unfortunately, what we've seen on the ground is many on-the-job walkaways due to other housing obstacles that must be addressed under the rules of the Department of Environmental Protection, such as structural damage, asbestos, lead paint, and roofing/moisture issues. Flexibility between the energy and health needs of a unit ensure that units are not deferred for lack of adequate funding for a certain silo of services.

Substandard housing is a serious and widespread issue, particularly in NJ cities with older housing stock. While investing in energy upgrades are a viable option for moderate-income households, for low-income households it can be far from a priority. Through a more comprehensive approach, there is opportunity for the EMP to not only address energy insecurity, in which 44% of low-income households struggle with, but to decrease the risk of a range of health issues, including lead poisoning, asthma, depression, and cancer.

Goal 3.1.3: Adopt equitable clean energy financing mechanisms that enable greater penetration of energy efficiency opportunities for all customers.

Recommendations:

Require that energy efficiency services be distributed to recipients of the Low Income Home Energy Assistance Program to ensure funds aren't wasted in units with very low energy efficiency performance. This is done in other states.

Require improvements to the Weatherization Assistance Program. Revisions should include prioritizing the need of a unit over income qualification of the household, promoting customer trust by minimizing documentation requirements, and streamlining audits and walk-throughs to decrease time off from work. Currently, the program's system uses household income as the primary criterion for determining if a unit can receive weatherization services, preventing the units that have the most need from being treated. Additionally, the intake process requires excessive documentation that many customers find too much to bear – often they do not have the documentation needed and/or are unable to afford it. Those who lack the most financial resources also cannot afford to take off the time required by multiple energy audits, walkthroughs, and the contracted work in order to upgrade. In order to promote equitable services, the program must shift from “weatherizing people” to “weatherizing units”.

Provide incentives for landlords to participate in energy efficiency, weatherization, and lead programs. Often landlords are unconcerned with rental property conditions because in certain aspects, it does not directly affect their income. This includes energy cost.

Goal 3.1.4 Streamline marketing, education, awareness, and program administration.

Recommendation:

Include public health, safety, energy efficiency, and equity as explicit, inseparable overarching goals of the clearinghouse, and make it a requirement rather than a suggestion. A clearinghouse that coordinates the multitude of programs offered is necessary to penetrate low-income and environmental justice communities, and so should be added as a deliberate action item in the EMP in order to promote energy efficiency upgrades, decrease household spending on utility bills, and streamline customer engagement. Energy efficiency cannot be separated from indoor air quality and lead issues. As mentioned earlier, the number of units that could receive energy efficiency upgrades has been limited due to lack of coordination amongst environmental health and safety services. Homeowners are also currently confused about the difference between the WAP and Comfort Partners/NJ Clean Energy programs. It is critical that all programs are housed under one roof.

Goal 6.1: Develop a comprehensive Community Energy Plan in concert with local community groups to identify energy needs and establish ways to participate in and benefit from the clean energy transition at the local level.

Recommendation:

Promote community resilience by funding the establishment of Community Resilience Hubs (CRHs) around the state. CRHs would support vulnerable communities as natural disasters become more frequent as a result of climate change. These hubs would serve as community-run centers powered by clean energy that deploy aid and services to residents during these events.

Goals 6.2.1 / 6.2.2: Support community-led development of community solar projects / Incentivize maximum installation of rooftop and community solar by the local workforce

Recommendations:

Bring in customers and contractors into planning and decision-making processes from the beginning through focus groups to help design a program that ultimately works for them.

Include Vote Solar's recommended concrete goals of achieving 250,000 low-income solar households and 400 MW of Storage for Low-Income and Environmental Justice Communities by 2030.

Goal 6.2.3: Develop clean energy workforce opportunities and training programs.

Recommendation:

Include dedicated funding for cross-field training in energy efficiency and environmental health services to reduce the number of units deferred from energy upgrades. Combining energy efficiency and environmental training takes advantage of a workforce that already understands buildings and assesses these homes as a part of their work.

Conclusion

We are encouraged by the administration's intent to ensure that low-income and environmental justice communities benefit from the transition to clean energy, but insist that concrete goals and actionable items be added to the revised Energy Master Plan so that these communities are not an after-thought in the planning process. Rather, the EMP should prioritize improving the basic living conditions and energy inefficiencies within these communities. The recommendations listed above will accelerate and support the penetration of clean energy benefits within low-income and environmental justice communities.