My name is Richard Lawton, and I am the Executive Director for the New Jersey Sustainable Business Council (NSBC). NJSBC is a coalition of businesses and business networks throughout the state committed to advancing policies that support a vibrant and sustainable economy. The Council brings together the perspective, experience, and political will of businesses to stimulate our economy, strengthen our communities, and preserve our environment. After forming early last year, the organizations and companies that have joined in this partnership represent over 2,000 businesses, and this number continues to grow each month.

We appreciate the opportunity to provide input for what we consider to be a critically important project. Summarized below are our recommendations for your consideration:

1. **Improve energy efficiency savings** by requiring a 30% reduction for electric and natural gas usage for New Jersey by 2030 with clear, measurable interim benchmarks, including support for conservation programs.

2. **Expand energy efficiency at industrial facilities** that will serve to reduce greenhouse gas emissions, maximize efficiency, reduce waste and help industrial facilities be more competitive nationally and globally.
   - Consider property tax incentives for commercial buildings that exceed a specified energy efficiency score. This would require all commercial buildings to be audited and scored using the Energy Star platform. To take this one step further, those buildings that fall below a certain score could be assessed an additional utility efficiency tax the proceeds of which would go toward funding efficiency incentives.

3. **Improve green building standards for new and existing construction.**
   - Examine and update building envelope and efficiency codes and requirements.
• Provide funding to qualified labor-management training providers to train employees in operations and maintenance to optimize building performance.

• Implement green cleaning and renewable energy measures in public and commercial buildings, particularly schools. Offer free benchmarking for hospitals, municipalities, public schools, universities, multifamily units, retail, and other sectors allows for greater insight into the benefit of energy efficiency.

• The requirement of a Home Energy Score is an important part of the EE process. A number of cities including Austin, Portland, and Berkeley require homeowners to obtain these scores as part of the real estate sales process. Massachusetts recently tried to pass the first statewide requirement, but the provision was removed from the final bill.

4. Convene an energy efficiency Task Force
   • The state must convene a task force of building industry professionals and stakeholders to chart a comprehensive and long-term path to reducing pollution in the building sector.
   • The task force should consider best practices in building use, operations, and design, ways to increase energy audits and energy use transparency, changes to the state’s uniform building code that can improve efficiency in new buildings, recycled materials, location siting, waste management, and a full set of policy options to drive retrofits in existing buildings.

5. Establish energy data transparency
   • Access to energy data is the foundation for any real building efficiency progress; residents and building owners need simple access to understandable, reliable information.
   • The NJBPU should give building owners and managers electronic access to monthly, wholebuilding, aggregated energy consumption data with reasonable confidentiality protections for tenants. Being able to measure and verify energy reduction is critical.

6. Invest in building departments
   • Invest in the building performance departments of the future. Local building departments must be given the tools and resources they need to implement New Jersey’s building energy standards.
   • Current policy rewards the exceeding of mandatory code, but does not address the larger problems of overall compliance and older buildings that lag far behind current standards.
• To achieve state goals for efficiency and energy independence, the state must prioritize strong compliance for all buildings with the state's energy code and consider incentivizing up-to-code improvements for buildings designed and built to lower standards.

7. **Invest in Environmental Justice communities and in job training**
   • Create an apprenticeship program that offers companies tax incentives to hire and train EJ community members to perform energy efficiency-related work within EJ communities.
   • Using the standards of the Building Performance Institute (BPI) to certify training centers along with improving funding and opportunities for job training in energy efficiency and environmental health will offer major savings for low-income families, better community health, and family-sustaining job.

8. **All funds earmarked for energy efficiency programs should only used for their intended purpose**, and legally protected from being diverted to general funds or for any other purposes.

We are grateful for Governor Murphy’s leadership in guiding New Jersey to a clean energy economy, and appreciate the important role that the Board of Utilities plays in the complex task of mapping out a strategy to actualize such an important vision.

Thank you.

Sincerely,
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