August 30, 2022

New York State Energy Research and Development Authority (NYSERDA)
17 Columbia Circle
Albany, NY 12203

Re: NYStretch 2023

New York Solar Energy Industries Association (NYSEIA) and Vote Solar appreciate the opportunity to submit comments on the NYStretch 2023 draft model code.

New York Solar Energy Industries Association (NYSEIA) is a nonprofit industry trade association proudly representing hundreds of distributed solar and storage businesses with thousands of employees across the Empire State. Our mission is to advance and accelerate distributed solar energy and energy storage deployment in New York State. Our membership is primarily comprised of local, regional, and national firms working every day to help achieve the ambitious clean energy and equity goals outlined in the Climate Leadership and Community Protection Act (CLCPA).

Vote Solar is a non-profit organization that fights for a 100% clean energy transition that puts the interests, health and well-being of people at its center. Vote Solar is focused not only on transitioning to a clean energy economy, but making sure we do so in a way that includes and benefits everyone.

Distributed solar and storage projects (DERs) present a unique opportunity to build a resilient electric grid that saves individual consumers money on our path to a zero-emission power sector by 2040. In addition, localized solar power generation and battery storage adds efficiency and reduces costs for all electricity consumers by helping to curtail the need for expensive grid upgrades.

By writing our buildings code with an equity and justice approach, we can make our society fairer and begin to make up for the injustices and inequities of the past. The NYStretch 2023 code – if it is stringent in its requirements – will play a key role in the state's ability to reach the climate and clean energy goals put forward in the CLCPA. We are encouraged by the proposed NYStretch 2023 code and offer the following comments:

The NYStretch 2023 code could require all new homes, multifamily buildings, and commercial buildings to be all-electric.

For New York to reach its climate and clean energy goals, we need to drastically reduce the use of fossil fuels in our homes and buildings. We should be constructing new homes and commercial buildings with those long-term goals in mind to avoid needing even more expensive retrofits. Instead of requiring new buildings to be electric-ready, the NYStretch code could require new homes, multifamily buildings, and commercial buildings to be all-electric.

All-electric homes are more affordable to construct and more affordable to operate, as shown, for example, by this study as it pertains to New York City. Additionally, all-electric buildings are better for public health. Studies have shown that burning fossil fuels inside of our homes can create dangerous levels of air pollution. In fact, indoor air pollution from combusting gas in our homes can be so high that the room air would not meet air quality requirements for outdoor settings. Energy-burdened households, with their unaffordable utility bills and disproportionately high rates of emissions-related health conditions, such as asthma, stand to benefit the most from energy-efficient affordable housing and declining emissions. Building more affordable homes that are healthier to live in will be particularly beneficial for LMI families and disadvantaged communities that experience high levels of air pollution and spend a higher percentage of their monthly income on energy costs.

All-electric homes and buildings can be even more beneficial for the environment and consumers when paired with rooftop solar.

Rooftop solar should be a requirement for residential and commercial buildings and should be paired with battery storage.

We support NYSERDA's proposal to require solar on new homes, multifamily buildings, and commercial buildings in the NYStretch 2023 code. This requirement should remain in the final code. It is a critical step towards reaching the state's climate and clean energy goals. New York can continue to be a leader in the transition to clean, renewable energy by ensuring that new buildings are constructed with onsite solar. For commercial buildings, we support the proposal to require off-site renewable energy where on-site renewable energy is not feasible.

Installing solar during construction of a new home can be more cost effective and allows homeowners to roll the cost of the solar system into their mortgage or finance the system through a third-party financing option. Furthermore, given that New York has some of the highest electric rates in the country, having rooftop solar as a standard feature on new homes will help consumers reduce their electricity bills - making an all-electric home more affordable.

A report from Local Solar for All found that exceeding New York's goal of 10 GW of distributed solar could save $28 billion by 2050. Energysage, a solar marketplace, estimates that New York homeowners with a 6-kW rooftop solar system can save over $25,000 over 20 years. With the solar Investment Tax Credit now set at 30% for the next 10 years, there is no better time to ensure that all new homes and buildings are built with rooftop solar.

In addition to keeping the solar requirement in the stretch code, the stretch code should require that all new buildings pair rooftop solar with battery storage, where feasible, to create a more resilient electric grid that benefits all New Yorkers. Solar paired with storage can help homes and businesses keep power going for some, if not all, of the building during power outages. For New Yorkers that need a constant source of power, to keep medicine refrigerated for example, pairing solar and battery storage can be a critical tool. Having more battery storage on the grid will also enable greater participation in grid services programs such as demand response that can help ensure the grid has the electricity supply that it needs.

Requiring new construction to be all-electric with rooftop solar and battery storage will allow New York to build the homes and buildings of the future that are better for the climate, the electric grid, and New Yorkers.

EV ready spaces should be a requirement for one- and two-family dwellings, and townhouses. EV spaces should be a requirement for multifamily and commercial buildings.

As we transition away from fossil fuels, more and more vehicles will be electric. This means that we will need more places to charge electric vehicles. We applaud NYSERDA for proposing that one- and two- family dwellings as well as townhouses have EV ready spaces and that multifamily and commercial buildings have required EV spaces, EV capable spaces, and EV ready spaces. These requirements should remain in the final code.

On average, EV owners charge their cars at home or at their workplace 80% of the time. Infrastructure being built today should support that trend. Pairing EV charging with rooftop solar allows customers to charge their EV with clean energy while helping to keep their electric bills affordable.

Conclusion

We support the direction of the NYStretch 2023 code and hope that the finalized version includes consideration for all-electric buildings, and requirements for on-site renewable energy

paired with battery storage, and EV ready or EV spaces for new homes and buildings. Thank you for the consideration of these comments.

Sincerely,
/s/ Zack Dufresne
NYSEIA Executive Director

/s/ Lindsay Griffin
Vote Solar Regulatory Director, Northeast