From: Thomas Wright
To: erda.sm.scopingplan
Subject: Public Comment on NY"s Draft Scoping Plan: Buildings Sector
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Thank you for this opportunity to provide comments on the draft scoping plan. As required by New York's nation-leading climate law, the CLCPA, climate and environmental justice must be the driver of the outcomes of this scoping plan. To achieve this, please ensure that the following recommendations on the Buildings Sector are included in the final draft:

The Buildings chapter calls for the adoption of advanced zero-emissions codes and standards to enhance building performance and phase out fossil fuel combustion appliances and technologies following an accelerated timeline that will require near-term enabling action by NYS legislators. While the chapter acknowledges concerns raised by the Climate Justice Working Group regarding the need to front-load investments, technical assistance, and other resources in disadvantaged communities (DACs) to ensure those communities are not left stranded in an aging and expensive fossil fuel-based energy system, it fails to align strategies that prioritize investments in DACs with the proposed timelines for the adoption of new codes and standards. These strategies must move in lockstep to create the conditions for a Just Transition. The chapter calls for the creation of a new Retrofit and Electrification Readiness Fund. This should be created ASAP and capitalized at a minimum of $1 billion per year following the recommendations of the Energy Efficiency and Housing Advisory Panel. The Fund should provide targeted direct investments to DACs and the affordable housing sector.

The Buildings chapter failed to advance recommendations from the Climate Justice Working Group around consumer and community protections that would guard against energy rate increases, predatory business practices, mistreatment by landlords, and gentrification and neighborhood displacement. The following recommendations should be included in the final scoping plan:

- Utility customer bill of rights
- Safety net guarantee of affordable renewable energy to every household
- Public education to combat the power of the investor-owned utilities and the opaqueness of the energy system
- Clawback provisions around public subsidies to private landlords as an anti-displacement strategy to mitigate rent increases and evictions

The failure to include these recommendations in the final scoping plan will leave low- to moderate-income households and DACs vulnerable to extractive financial forces and for-profit solution providers.

Sincerely,
Thomas Wright