

1 [Dan] Good morning everyone. I'm Dan Henfield, the  
2 Director of the Weatherization Assistance Program for New York  
3 State Homes and Community Renewal. We're here today at our New  
4 York City office to conduct a public hearing on the draft 2020  
5 Weatherization Assistance Program State Plan. This public  
6 hearing is being simultaneously video cast to our HCR offices  
7 in Albany, Buffalo, and Syracuse. Individuals in these offices  
8 will have the opportunity to testify and submit comments on the  
9 draft 2020 State Plan. Additionally, we will accept and review  
10 comments on the draft State Plan until the close of business  
11 tomorrow, Friday, January 10, 2020. Copies of the draft State  
12 Plan are available on the state's WAP website, Weatherization  
13 Assistance Plan website, at [hcr.ny.gov/weatherization](http://hcr.ny.gov/weatherization) or by  
14 calling (518) 474-5700 and requesting a copy.

15 The Weatherization Assistance Program is funded by the US  
16 Department of Energy. New York State supplements the DOE  
17 funding with low income energy assistance program funds from  
18 the US Department of Health and Human Services. The purpose of  
19 the weatherization program is to increase the energy efficiency  
20 of dwellings owned or occupied by low income persons, reduce  
21 their total residential energy expenditures, and improve the  
22 health and safety of the residents especially low income  
23 persons who are particularly vulnerable such as elderly,  
24 persons with disabilities, and children.

25 This public hearing is being held pursuant to Title 10 of the

1 Code of Federal Regulations, Section 440.14A. If anyone would  
2 like to make a presentation today at the hearing, we ask that  
3 you please provide a written copy of your testimony at the time  
4 of presentation. Oral presentations should not exceed three  
5 minutes.

6 Before we open the hearing for comments, I want to request that  
7 each of the regional offices put their speakers on mute when no  
8 one is speaking from that office. Now I'm going to ask if  
9 there's anyone in this office, in the New York City office, who  
10 is interested in providing testimony.

11 [Valerie] I'm Valerie Strouse, I'm with the Association  
12 for Energy Affordability. It's based in the Bronx and is a  
13 subgrantee. I'm Director of Policy and Regulatory Affairs,  
14 however I am speaking today in capacity as the New York State  
15 Coordinator Lead for the Energy Efficiency For All New York  
16 Coalition, which is a coalition of AEA, working families,  
17 enterprise community partners, Green and Healthy Homes  
18 Initiative, Natural Resources Defense Council, \Pace\ Energy  
19 and Climate Center, and \We Act\ for Environmental Justice.  
20 The Energy Efficiency for All New York Coalition very much  
21 appreciates the work of the Weatherization Assistance Program.  
22 \Both of\ EEFA, as we're known, and WAP are completely aligned  
23 and our comments are offered in the spirit of improving upon a  
24 program that we believe is vital to serving low income  
25 households in our state. These comments are offered in the

1 hopes of improving upon a program that not only increases  
2 energy affordability, comfort, health, and safety in homes but  
3 also provides benefits to local communities and contributes to  
4 our mission's reductions goals. While we recognize the primary  
5 purpose of the State Plan is to comply with DOE requirements  
6 \as service application\ for DOE funds, it also is the  
7 foundation for program implementation. As such, we respectfully  
8 suggest that it could benefit from additional language that  
9 acknowledges and aligns WAP more closely with New York's  
10 climate, energy, and energy affordability goals. New York has  
11 an energy affordability policy that strives for no more than a  
12 6% energy burden, has climate goals that are now codified in  
13 the Climate Leadership and Community Protection Act as well as  
14 pre-CLCPA energy efficiency goals and New Efficiency New York  
15 preceding, the Department of Public Service, and within the  
16 state energy plan. Explanations and guidance on how the  
17 Weatherization Assistance Program can help meet those goals  
18 would be appropriate and welcome within the State Plan.  
19 In addition, we have some examples of where we believe the  
20 language in the current draft State Plan appears to be out of  
21 date with state wide policy endeavors. There is in particular  
22 references to electric heat as the expansion of natural gas  
23 infrastructure. The draft State Plan on Pages 16 and 18—I do  
24 have quotes in my written testimony but I won't read them—  
25 discuss the predominant heating fuels that are in different

1 parts of the state, notably between delivered fuels and oil,  
2 electrical \style\ electric resistance heating, etcetera, and  
3 it notes that \old style\ electric heating is much more common  
4 in the winter households in less energy efficient buildings. It  
5 also states that- that's all it says about electric heat. It  
6 also suggests that HCR will be encouraging subgrantees to  
7 coordinate weatherization with replacement of heating systems  
8 that can be converted from oil or other delivered fuels to  
9 natural gas, and here I am quoting "HCR is participating in an  
10 initiative sponsored by the New York State Public Service  
11 Commission to explore cost saving opportunities associated with  
12 the expansion of natural gas service."

13 While old electric heating systems and oil and delivered fuel  
14 systems certainly merit replacement, New York is increasingly  
15 looking toward building electrification \inaudible\ \source\  
16 heat pumps as an important component of meeting our climate  
17 goals and as an alternative to natural gas expansion.

18 References to electric heat, we believe, should therefore  
19 distinguish between the older systems and the newer heat pump  
20 systems and references to replacing oil and delivered fuels  
21 should also reference heat pumps and the state's goals for  
22 electrification.

23 Furthermore, consideration of what we refer to as equitable  
24 electrification which encompasses ensuring access to heat pumps  
25 by low income households so they're not left behind during this

1 push for electrification, but also addressing the affordability  
2 concerns that arise when electrification occurs should be a  
3 discussion in the State Plan and within the Weatherization  
4 Assistance Program.

5 In addition to exploring the use of heat pumps, EEFA New York  
6 fully supports consideration of renewable energy systems within  
7 the weatherization work scopes, and we support developing a  
8 standardized process including solar \PB, \inaudible\ \pilot\  
9 for case by case approaches which are more cumbersome. As a  
10 coalition focused on energy efficiency and affordable multi-  
11 family housing we are dedicated to ensuring the sufficient and  
12 appropriate allocation of funds for low income housing. We  
13 respectfully suggest that the weatherization program strive to  
14 allocate funds based on the percentage of population in need of  
15 the assistance, and consideration of finding other sources of  
16 funds for weatherization would also be appropriate.

17 Lastly, we encourage explicit recognition of the importance of  
18 interagency coordination to deliver the benefits of energy  
19 assistance to low income households \and providers of\  
20 affordable housing. \The\ agency work group for low income  
21 energy issues that the state has formed would be an appropriate  
22 place to have this conversation, as well as coordination with  
23 utilities and exploration of best practices from other states.

24 I very much appreciate the opportunity to provide these  
25 comments. We would be happy to provide other information or

1 continue the discussion further. Thank you.

2 [Dan] Would anyone else in New York City like to speak? ...  
3 We're gonna now go to the Albany office. \Casey\, if you can  
4 ask anyone in Albany if they'd like to speak.

5 [Casey] We don't have anyone at this time.

6 [Dan] Thank you. Now we'll go to the Syracuse office.  
7 Beth, if you could ask anyone there if they'd like to speak.

8 [Beth] yes, Andy Stone would like to speak now.

9 [Dan] Thank you.

10 [Andy] My name is Andy Stone. I'm the Executive Director  
11 of the New York State Weatherization Directors Association. I  
12 represent as the leader of a member organization the 52  
13 subgrantees funded by the Weatherization Assistance Program in  
14 New York State. NYSWDA provides training, supportive services,  
15 and technical guidance to your network of weatherization  
16 assistance programs in a constant effort to improve local  
17 programming and New York State's standing with federal DOE. I'm  
18 proud to say that NYSWDA maintains nearly a 100% member  
19 participation rate with our state network and has for years.  
20 Thank you for the opportunity to comment today on the New York  
21 State Weatherization Assistance Program draft State Plan for  
22 program year 2020. We are generally pleased with the plan and  
23 the direction it has taken this year, however one significant  
24 change over the past few years has taken place that we are not  
25 in agreement with and this will be discussed further below.

1 First and foremost, we appreciate the fact that HCR has set two  
2 rounds of discussion on the State Plan, a plan development  
3 request and the hearing itself. Both requests were released  
4 early in the process and this is appreciated, however the  
5 timeline for response on each of them was way too short and  
6 more time should be given to the network and the \pack\ to  
7 review past years' plans and the current draft. Additionally,  
8 it would be really helpful to provide a synopsis of changes  
9 made to the plan or a red line version which would make the  
10 review process easier on everyone.

11 Specific to the 2020 draft State Plan I'd like to offer the  
12 following comments. Regarding the program budget and the  
13 proposed distribution of DOE and HEAP funding, it is not made  
14 clear whether HEAP funding is proposed at 100%. If 10% is being  
15 withheld due to federal regulation as it was in prior years it  
16 should at least be noted in the plan with a footnote so that if  
17 an amendment is necessary later in the year agencies will have  
18 some prior notice and can plan for the increase rather than  
19 finding out in October that they will be getting more funding.

20 I understand it's impossible to predict what will ultimately  
21 happen with federal allocations, but prior knowledge to  
22 potential changes would be helpful and valuable information to  
23 the network.

24 **Set asides:** There was a fair amount of discussion at regional  
25 task force meetings whether some funding should be withheld for

1 set aside awards. Set aside used to be a common in the program  
2 and with funding starting to increase it should be considered  
3 again. Smaller agencies don't have the resources to accommodate  
4 multi-family units or other initiatives such as renewables, and  
5 set aside could offer them room to be more creative. Set aside  
6 would also benefit agencies planning to partner in the HCRP+  
7 initiative allowing them to bring more to the table when units  
8 are identified.

9 Minimum allocations: The plan states that the minimum  
10 allocation for agencies will be \$400,000. With funding up  
11 slightly it would be nice to see the minimum raised to a more  
12 manageable level. Formula driven and dual-county agencies have  
13 a little more latitude with their contract management than the  
14 minimums do. Low funding and stagnant wages result in high  
15 turnover which has been a malignant problem in the program.

16 Contract production calculation: This year the production  
17 percentage calculation has been increased to 18% giving  
18 agencies a more realistic and mathematically appropriate way to  
19 manage their contracts. This is also a reasonable concession on  
20 the part of the state to reduce the production burden and  
21 increase overall administrative latitude for programs at the  
22 local level.

23 Regarding administrative rates: The plan indicates that each  
24 subgrantee will be allowed to use 6% of the first 1.5 million  
25 in their allocation and 5% of the balance of allocation for

1 administrative costs. Although 6% does not cover the full  
2 administrative rates for most agencies, the higher rate again  
3 this year shows some effort on the part of HCR to recognize  
4 this is an issue. It does however put undue pressure on  
5 programs to deliver alternative, unrestricted net assets to  
6 fill in the shortfall.

7 Regarding leveraging: Since NYSCERTA acquired 14.4 million  
8 dollars in HEAP funding through Social Services 97-5 for use in  
9 the Empower New York program, I would encourage HCR to make  
10 every effort possible to ensure that the majority of those  
11 funds flow through the weatherization subgrantee network  
12 regardless of whether they are leveraged, Fee For Service, or  
13 earned program income. Now that Empower is fuel-neutral,  
14 agencies across the state that have not previously been able to  
15 participate have a huge opportunity to enhance services in  
16 their territory. It's been noted in \pack\ meetings that  
17 attempting to achieve a 6% energy burden on low income HEAP  
18 households is a goal of the governor's office as well as OTDA.  
19 By combining funds and focusing on households with the highest  
20 energy burden we can achieve significant savings well beyond  
21 the reach of each program separately, and the Empower program,  
22 weatherization, and most importantly the families we serve will  
23 benefit from this strategy.

24 Network participation continues to be low and every effort  
25 should be made by HCR staff to understand why this is happening

1 and get agencies onboard. Encouraging network participation  
2 will enlarge programs, enhance services, and allow agencies to  
3 raise labor rates to a level more in keeping with the market,  
4 hopefully reducing turnover. I believe HCR's effort to assist  
5 should take several forms. First, streamlining through a  
6 reduction in required forms of other non-mandated regulatory  
7 obligation needs to take effect. This has been started, but re-  
8 evaluated forms and the updated Pilot Program have yet to be  
9 released. Second, work toward a better cooperative arrangement  
10 with NYSERDA. Through better cooperation with NYSERDA on client  
11 approval, work scope generation, heating appliance  
12 replacements, and the upcoming potential for \PV\ solar and  
13 heat pump technology, your local network can become more nimble  
14 and better use available funds resulting in better services.  
15 This should be a priority for the interagency task force.  
16 Third, eliminate shared cost road blocks. By incorporating  
17 generally accepted accounting principle for cost allocation and  
18 fund accounting, paperwork and reporting will be simplified  
19 benefiting any agency will has desire to expand their  
20 services. This is nothing new and fairly simple to implement.  
21 The revise program income rules are a stepping stone to this  
22 goal, and every agency should be encouraged or even mandated to  
23 participate.

24 Multi-family owner investment: Regarding owner investments,  
25 there were several issues discussed at the New York City

1 regional task force meeting regarding owner contribution.  
2 Recommendations were made to revise the Pilot Program language  
3 regarding owner contribution. Emphasis was to simplify and  
4 redefine requirements of the 25% minimum investment. Similarly,  
5 it was proposed for the 15% owner investment that the phrase  
6 581A would be eliminated and the requirement change to at least  
7 50% documented income regulated. This would be a more inclusive  
8 phrase which would encompass more affordable housing  
9 properties.

10 Regarding the \ASKI\ satisfaction survey: Additional language  
11 was added to the plan with regard to the DOE satisfaction  
12 survey. It's important that the survey stay on the table, and  
13 I'm encouraged that HCR staff is making their response to the  
14 results open and transparent. Believe me when I say that the  
15 network wants nothing more than to fix some of the issues that  
16 exist in the program. This is a great first step in maintaining  
17 communication and a huge step in the right direction.

18 Regarding training and technical assistance: The state's T&TA  
19 platform has been moved to a service contract even though New  
20 York State Controller's office indicated that this was not  
21 necessary. The RFP process was long, unnecessarily complicated,  
22 and wasted valuable time on both sides. The results has been  
23 contracted services that are limited in scope and funding. We  
24 believe this course of action has diminished services,  
25 eliminated any ability for AEA and NYSWDA to do long term

1 planning, and is not in the best interest of New York State's  
2 Weatherization Assistance Program as a whole. AEA and NYSWDA  
3 have spent years developing our organizations and have a better  
4 understanding of New York State WAP program policy than any  
5 other potential entity. Diminishing both organizations to  
6 service provider status through a safer procurement process was  
7 not the right decision and was not required by the Office of  
8 the State Controller who stated that their office generally  
9 defers to the procuring agency's determinations on matters  
10 properly within the agency's expertise. Ultimately, a sole  
11 source \CRER\ was deemed appropriate and both associations  
12 should have been funded directly through the State Plan. AEA  
13 and NYSWDA have evolved based on contract deliverables and the  
14 needs of our network to the point where our services comingled  
15 with the needs of the state, whether it's providing technical  
16 support on \one-to-four\ multi-family units or delivering  
17 course work from well-appointed training centers which have  
18 taken years to develop, these services cannot be replicated.  
19 Based on all indicators to date, we do not believe this process  
20 will ultimately improve anything and it is our hope that HCR  
21 will reconsider this major change and fight the fight needed to  
22 \keep technical assistance\ where it belongs in the State Plan  
23 as subgrantee status.

24 In closing, I feel that it's important to state that the  
25 success of the New York State Weatherization Assistance Program

1 needs to be based on a cooperative \inaudible\ partnerships  
2 with open dialogue and communication between state staff, your  
3 technical assistance providers, and your local programs. New  
4 York's WAP program has a lot to bring to the table in forging  
5 and maintaining partnerships with state staff, stakeholders  
6 like NYSERDA and their Empower program, as well as AEA and  
7 NYSWDA, can only enhance your program and your ability to  
8 deliver it to low income residents of New York State. Thank  
9 you.

10 [Dan] Thank you, Andy, and just a reminder to give a copy  
11 of that to Beth. Is there anyone else in the Syracuse office  
12 that is there to speak?

13 [Beth] No, there's no one here at this time, Dan.

14 [Dan] Okay. Let's go to the Buffalo office. Rick Joste, is  
15 there anyone there that wishes to speak?

16 [Rick] No, there's not.

17 [Dan] Okay. We'll come back. We have some new arrivals at  
18 the New York City office. Is there anyone who is interested in  
19 speaking?

20 [Joe] Good morning. My name is Joe \Barden\ and I serve as  
21 the Executive Director of Margaret Community Corporation.  
22 Margaret is a community based nonprofit neighborhood  
23 preservation company located in \inaudible\ and is a subgrantee  
24 responsible for administering the New York State Homes and  
25 Community Renewal Weatherization Assistance Program in South

1 Queens. On behalf of the Board of Directors and staff of  
2 Margaret and the New York State high energy burdened households  
3 we serve, I would like to take advantage of this opportunity to  
4 offer the following comments on the WAP 2020 State Plan.  
5 We strongly support the plan's emphasis upon leveraging and  
6 coordination with other programs, to supplement funding for the  
7 program and to generate additional non-federal resources for  
8 weatherization. We're especially excited about the  
9 possibilities presented by the Weatherization Preservation Plus  
10 initiative and hopeful for the selection of a project within  
11 our service territory in the near future. We wonder though, and  
12 not for the first time, when we might realistically expect  
13 additional benefits to assisted households and additional  
14 funding opportunities for subgrantees to become manifest as a  
15 result of HCR's alignment with the National healthy Homes  
16 Initiative.

17 We urge New York State Homes and Community Renewal to take the  
18 leadership role in the interagency task force on energy needs.  
19 I remain cautiously optimistic that our network for  
20 weatherization subgrantees will be recognized and embraced as  
21 the appropriate vehicle through which to most effectively  
22 address the energy needs of low income communities and improve  
23 outcomes for low income households in New York State.

24 We fully support the manner in which New York State transfers a  
25 portion of its HEAP allocation to weatherization. I continue to

1 urge the state to maximize the infusion of HEAP dollars to the  
2 fullest extent possible.

3 We are grateful for the continuing coordination with NYSERDA's  
4 low income energy efficiency programs. I look forward to once  
5 again serving both small homes and hopefully some multi-family  
6 buildings through the Empower New York program.

7 As the interagency referrals, we continue to mourn the loss of  
8 the weatherization referral and packaging program through which  
9 energy, housing, and social services were coordinated for  
10 elderly participants who were otherwise unable to identify and  
11 access such services on their own. The streamlining and  
12 efficiencies of the \wrap\ program were beneficial to both the  
13 program and its participants and should receive strong  
14 consideration for resurrection.

15 We fully support the plan's encouragement of subgrantees to  
16 coordinate with OTDA, or HRA in New York City, on the heating  
17 repair and replacement program for HEAP clients, and we remain  
18 ready, willing and able to participate in both emergency  
19 heating and cooling programs. We once again urge HCR to  
20 strongly consider a return to a more active role in the direct  
21 administration of these initiatives.

22 As to the plan's funding allocation formula, we simply note  
23 again the large percentage of subgrantees receiving adjusted  
24 allocations with no further comment at this time, but we do  
25 feel compelled to comment on the status of our technical

1 assistance providers. The failure to protect these important  
2 entities as TA subgrantees as they had been clearly recognized  
3 in prior state plans as well as the allocation charts has led  
4 to unforeseen consequences that threaten the delivery of these  
5 critical services throughout the state. AEA and NYSWDA provide  
6 invaluable services to both the weatherization network and to  
7 HCR. We strongly urge HCR to acknowledge their unique status as  
8 TA providers and provide funding consistent with the services  
9 they provide.

10 Last but not least, we extend our deepest gratitude to New York  
11 State HCR leadership and staff, both in Albany and New York  
12 City and throughout the state, for their continued assistance  
13 and support. Thank you for your time and attention this  
14 morning.

15 [Dan] Thank you, Joe. I have a copy of Joe's \inaudible\  
16 Is there anybody else in New York City that wishes to speak at  
17 this time? ... Okay. We'll go back around to Albany. Is there  
18 anyone in Albany that wishes to speak at this time?

19 [Casey] Not at this time.

20 [Dan] Okay. I don't see anyone else arriving in Syracuse.  
21 I'm just gonna ask in Buffalo. Does anyone else wish to speak?

22 [Rick] No, Dan.

23 [Dan] At this time I'm gonna mute our line and I ask that  
24 you all mute your line. If someone in your office wishes to  
25 speak, please unmute and just announce your presence and we'll

1 start back up again. We're conducting this hearing until noon,  
2 so people still have time to arrive or get notes together and  
3 decide they want to speak. We'll mute our line. Thank you all,  
4 and we'll stay here.

5 (extended pause)

6 [Dan] We're back. In New York City, we're gonna have Dave  
7 \Epinstal\ speak.

8 [Dave] David \Hepinstal\, the Executive Director of  
9 Association for Energy Affordability. On behalf of AEA we wish  
10 to thank you for the opportunity to provide comments in the HCR  
11 WAP program year 2020 draft State Plan. As the Executive  
12 Director of AEA, I've been an active participant in New York  
13 State's weatherization program for many years as we played  
14 diverse roles in WAP, as a training and technical services  
15 provider and as a WAP direct services subgrantee serving  
16 sections of the Bronx and Queens. Personally as a member and  
17 vice-chair of this \pack\, as participant in regional task  
18 force meetings, as a member of the steering committee, and as a  
19 regular participant in the national training conferences  
20 convened by \NASCAS\ and sponsored by \US DOE\. In the course  
21 of this work I've also led AEA in its implementation of  
22 government and utility energy efficiency programs that have  
23 often provided substantial leveraged funds in support of  
24 buildings being weatherized by WAP subgrantees. Through these  
25 roles and in my direct participation in policy advocacy in

1 support of the expansion of energy efficiency, particularly to  
2 promote preservation of affordable housing, I've had the  
3 opportunity to see the weatherization program from several  
4 different perspectives and vantage points, and to recognize the  
5 significant role that WAP can play in helping New York State to  
6 achieve its expanded clean energy and climate goals in the 2020  
7 WAP program year. In these brief comments I will focus  
8 primarily on the topics outlined below.

9 First I want to address specific items in the draft plan. I  
10 acknowledge the request for receipt from input in WAP network  
11 and \pack\ in the development of the plan, I acknowledge that  
12 and say this request was welcome in response to feedback, and  
13 there are signs that some of the input is reflected in this  
14 draft and that is promising.

15 Second, partnering with the New York State housing trust, the  
16 weatherization preservation trust initiative. This state  
17 investment of up to seven million dollars for this initiative  
18 is a promising opportunity for expanding the impact of WAP on  
19 affordable housing and preservation in New York State. We look  
20 forward to the possibility of playing a direct role in  
21 demonstrating the value of this partnership in 2020 through  
22 leveraging and coordination with other \programs\, Pages 9 and  
23 10.

24 This is a good list. We support all the items on the list and  
25 commit to being involved to support their successful

1 implementation. I don't want to repeat everything Joe said, but  
2 a lot of what we did more fully before and I would like it to  
3 be expanded, but it is a good list.

4 One correction or update \inaudible\, this past year is already  
5 \included buildings\ and subgrantees in Bronx and Manhattan not  
6 just Brooklyn and Queens. AEA has been directly involved in  
7 buildings in this pilot. The pilot has great potential to serve  
8 the low income households' greatest need well. The Healthy  
9 Homes coordination opportunities with the state and city health  
10 departments are also \inaudible\. We look forward to  
11 participating, census data summarized on Page 16.

12 The plan contains much good information \inaudible\, however  
13 typically there is neither a direct reference to the source or  
14 a footnote giving the precise source information.

15 Parenthetically, since some outdated information has at times  
16 been repeated from one year to the next in these plans, it is  
17 particularly important to add this. It could also be useful to  
18 incorporate some comparison data over time to show what changes  
19 are evident that might affect our plan. I really want to  
20 underscore what I just said. There's really good data and  
21 footnotes would really be helpful, \inaudible\ data over time  
22 as well.

23 Section 5.5, Page 19 needs to be updated and Valerie Strouse's  
24 comments referenced that so I won't repeat that.

25 \Centering\ more broadly, I want to address the issue of HEAP

1 funding for WAP. On behalf of our WAP network I wish to express  
2 disappointment that the budget numbers in the draft 2020 State  
3 Plan show that New York State still has not yet determined to  
4 allocate the full 15% of its federal HEAP allocation to the DOE  
5 weatherization program administered in New York by \inaudible\  
6 Since this is allowed by that HEAP statute, has been permitted  
7 by state law in New York since 1992, and is now required in  
8 many other states, it is disappointing that as much as 5% of  
9 this 15% \quote\ for weatherization purposes is being allocated  
10 to NYSERDA for Empower instead of directly to the  
11 weatherization program. We support the fact that this will  
12 support low income energy efficiency and that coordination with  
13 WAP is sometimes possible, however particularly from an  
14 affordable housing and downstate New York City perspective  
15 where most low income households reside in multi-unit  
16 buildings, the fact that Empower funds now limited solely to  
17 small homes or individual apartment units rather than the whole  
18 building measures and are not allocated by county based upon  
19 each county's share of the low income households in the state,  
20 as WAP is \through ACR\, means that both New York City and the  
21 multi-family affordable housing throughout the state are not  
22 being treated in an equitable fashion. I recommend that this  
23 issue be put on the agenda for interagency coordination  
24 discussions regarding addressing \inaudible\ households and the  
25 state's energy efficiency program \ramp up\, and that WAP's

1 steering committee participants be included in such meetings.  
2 Thank you for your consideration of these comments in the 2020  
3 WAP State Plan.

4 [Dan] Thank you, Dave. Anyone in New York City who would  
5 like to speak? ... We'll do another round. Let's ask again in  
6 Albany, if anyone there would like to speak.

7 [Casey] Nope, no there.

8 [Dan] Buffalo?

9 [Rick] No.

10 [Dan] And Syracuse?

11 [Beth] No, no one here.

12 [Dan] Alright. We'll go back to mute and we'll wait for  
13 the next person to unmute. Thank you.

14 (extended pause)

15 [Dan] Hello everybody. We're back, and I just wanted  
16 everybody to put on their speakers again.

17 [Director] As Director of \inaudible\ weatherization, I'm  
18 pleased to state that we have accomplished a great deal by  
19 providing energy—

20