



June 6th, 2025

Attn: Sherri L. Golden
Secretary of the Board
44 South Clinton Avenue
1st Floor, PO Box 350
Trenton, NJ 08625-0350

RE: In the Matter of the Clean Energy Programs and Budget for the Fiscal Year 2026, Docket No. QO25040206

On behalf of the American Lung Association, thank you for the opportunity to provide comments on the Fiscal Year 2026 Clean Energy Programs and Budget. Access to reliable and affordable clean energy is critical for the health and well-being of New Jersey residents.

We commend the BPU for its continued investment in clean energy programs that will reduce air pollution and associated health risks while advancing energy equity and addressing affordability concerns. These comments ensure FY2026 budgeted funds support cross-agency coordination with health partners, maximize funding for health equity initiatives, and prioritize outreach that clearly communicates the health benefits of electrification and energy efficient buildings. Please find our recommendations below for further consideration:

Electric Vehicle Program New FY2026 Funds

The Lung Association strongly supports the \$209.9 million in FY2026 funding for Electric Vehicle Programs, which includes \$99.9 million in new funding. However, there is a reduction of over \$6 million of new funding for the Clean Fleet program and a reduction of \$1.9 million in new FY2026 funding for the Multi-Unit Dwellings Charger program compared to FY2025 new funds. While carryforward funds may offset these decreases, continued new funding levels ensure ongoing support to reach this year's goal of 330,000 registered light-duty, plug-in EVs. Given the clear equity gap in EV adoption, continued investment in MUD charging infrastructure funding is critical. We urge the BPU to maintain or increase new funding to ensure low-income and multi-family communities are not left behind in the state's clean transportation transition. We encourage the BPU to enhance transparency around unspent carryforward funds to better understand program efficacy. Additionally, the E Mobility Programs allocate \$0 in new funding for FY2026. Since transportation is a significant barrier to accessing jobs, healthcare, education, and other daily needs for low-income residents, it is crucial that E-Mobility Programs receive full funding, and the proposed interventions are developed with community input and support.



Address Health Hazards in Whole House and Comfort Partners Program Budgets

The Lung Association remains concerned about how health hazards, such as mold, lead, and structural deficiencies, are identified and addressed in weatherization and retrofit projects, particularly in low-income and overburdened communities. It is very concerning that the Whole House Pilot program will be discontinued for FY2026. Home hazards can delay or prevent residents from accessing electrification and energy efficiency upgrades that improve air quality and support healthy housing. We urge the Board to preserve funding for the Whole House Pilot or specifically address how the Comfort Partners program will use new funds to address health hazards. The Lung Association suggests improved cross-agency collaboration with health and community affairs departments that may have the resources and authority to address these hazards directly.

Incorporate Health Messaging into Budgeted Education and Outreach Efforts

The Lung Association recommends that the Board ensure education and outreach allocations in FY2026 include health-focused messaging on the air quality and associated health benefits of electrification and energy efficiency. By coordinating with community health partners who already conduct home assessments and engage with vulnerable populations, the state can improve program uptake, share outreach materials, and strengthen the connection between clean energy and public health goals.

Support Long-Term Planning for Energy Affordability and Health Equity

We appreciate the Board's recognition of the health and equity co-benefits of energy efficiency and electrification. As NJCEP budgets continue to evolve, we urge the BPU to continue to prioritize long-term clean energy investments that address both environmental and public health needs through continued support for low-income energy assistance, promoting the adoption of high-efficiency appliances, and expanding access to weatherization and electrification incentives.

Alongside these priorities, we support the Board's \$5 million increase in new FY2026 funds for Urban Heat Island mitigation and encourage continued transparency in how these funds are deployed. Urban areas experience more heat-related illnesses, which can exacerbate health symptoms for residents with chronic respiratory conditions. Strategic investment in these areas is critical to achieving health equity outcomes tied to energy resilience and climate adaptation.

Address Energy Star Funding Concerns in FY2026 Programs

Given the uncertainty around the future of the federal Energy Star program, we encourage the BPU to explain in its FY2026 filings how it will work with public utilities to uphold Energy Star



standards. Clear guidance on utility-run Energy Star rebate and incentive programs will ensure customers can purchase and maintain Energy Star–certified, high-efficiency appliances, reducing costs and improving air quality. Transparent planning will help stakeholders understand how residents can meet energy-efficiency goals even if the federal Energy Star program changes.

Enhancing Transparency in Budget Allocations

We strongly recommend including a side-by-side comparison with FY2025 budget figures, either as an additional column or a separate table. This would greatly enhance transparency and allow the public to more easily assess year-over-year changes in program funding. This change would allow for a more efficient review of budget trends and improve accountability in tracking how program funds are spent over time.

Conclusion

The American Lung Association strongly supports the increased funding proposed for New Jersey's FY2026 Clean Energy Programs. As the state advances its clean energy goals, it is essential that the Board continues to prioritize equitable energy access to improve health outcomes, particularly for the most vulnerable communities. Strengthening collaboration with health agencies and organizations will further align clean energy investments with broader public health initiatives. We appreciate the Board's ongoing commitment to funding programs that reduce emissions and protect the health of all New Jersey residents.

Thank you for your consideration of these comments. Please reach out to Jaclyn.DiDonato@lung.org with any questions.

Sincerely,

Jaclyn DiDonato
Advocacy Manager, New Jersey
American Lung Association