



June 6, 2025

Secretary of the Board  
44 South Clinton Ave., 1st Floor  
Trenton, NJ 08625-0350

Posted via <https://publicaccess.bpu.state.nj.us/>  
CC: [board.secretary@bpu.nj.gov](mailto:board.secretary@bpu.nj.gov)

**RE: FY26 TRC COMPLIANCE FILING**

**Docket No. QO25040205**

Dear Secretary Lewis,

Thank you for this opportunity to comment on the FY26 Compliance filing submitted by TRC.

MaGrann Associates is a New Jersey based engineering and sustainability consulting company actively engaged in the Residential New Construction Program since its inception by New Jersey's utilities in 1987. We are a RESNET Accredited Provider and Energy Rating Company under the Home Energy Rating System (HERS), as well as raters and providers for ENERGY STAR, LEED, NGBS, ZERH, EGC and PHiUS. With a focus on multifamily and affordable housing, we deliver thousands of high performance new construction units each year under these and other certifications in New Jersey, and from Boston to Washington DC.

Overall, we would like to once again applaud TRC and the Clean Energy Program for the innovative and comprehensive approach to the New Construction Program (NCP) update. We offer the following comments for consideration:

1. We suggest adding language into the compliance filing to provide flexibility in program design to accommodate potential impacts from changes in federal programs such as EPA ENERGY STAR and DOE ZERO ENERGY READY. While we remain optimistic that these and other federal programs will remain intact, their foundational role in the NCP and other NJCEP programs means any significant changes will drive necessary adaptations to the New Jersey programs. We also note that as stakeholders with decades of experience navigating the technical and political shifts in support from federal standards, we are confident adaptations can be made if necessary to ensure uninterrupted availability of the NJ programs to market partners and participants, and stand ready to help in determining the optimal strategy for their preparation and implementation.

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2. Regarding Table 1 under the New Construction Program ("Eligibility for Pathways by Building Type"), we note that the Bundled Pathway is indicated as not available for Multifamily participation. However, our understanding based on guidelines recently released by the program, is that the common areas of multifamily buildings may leverage this pathway in order to recognize and incentivize the savings associated with these areas that are not covered by the ERI path calculation. While this is a minor point, we want to make sure that the "N/A" designation in the compliance filing document does not inadvertently preclude this important whole-building approach.

Thank you for this opportunity to provide comments. We encourage TRC in its role as program administrator to continue engaging with the builder and rater community and to provide further opportunities for input during the evolution of the NCP. On behalf of the entire MaGrann team, we look forward to continuing to support our many clients and projects under the program. As always, we are always happy to discuss these comments.

Sincerely,



Ben Adams  
Vice President Program Development