



**Statement by the  
American Council of Engineering Companies of New York**

**Committee on Environmental Protection, June 27, 2017**

The American Council of Engineering Companies of New York represents the professional engineering community. Our members are involved in all aspects of engineering: structural, mechanical, electrical, civil, environmental, plumbing, fire protection and technology systems.

ACEC New York is strongly committed to energy efficiency, sustainability and the City's 80x50 carbon reduction plan and supports the Council's efforts to advance those goals, but has serious concerns about two bills.

Intro. 1637 calls for the creation of a City energy policy task force, with participation of many specific categories of industry representatives but does not require the appointment of the people who actually design energy systems, professional engineers. Given the technical nature of the reporting which the bill requires, we request that this oversight be corrected.

With respect to Intro. 1629, we urge the Council to table this version and engage with our members and other stakeholders to arrive at an approach that addresses the following four criteria:

1. Is less speculative about future regulator and market events and forces that will inevitably change the impact of the requirements of this bill on New York City's building stock.
2. Carefully and clearly manages the transition from a predictive based regulatory framework to one that is outcome based and utilizes a EUI metric that is not unit building area based, but rather normalizes energy use intensity for the dramatic variations in space type, space use, human occupancy density, hours of operation and process loads found in the New York City built environment. Ideally, a metric based on a unit of economic or societal output could be developed.
3. Is purposefully informed by analysis of potential economic impact (including green job creation) associated with the proposed ramp rate of required increased building energy efficiency performance relative to the 80x50 carbon reduction trajectory. The City's current plan does not require buildings to be designed to Passive House standards in order to meet the 80x50 goal.
4. Provides market certainty and reduced risk relative to the economic impact of designing, constructing and operating buildings under these changing regulations.

We urge the Committee to direct its staff to meet with us and other allied stakeholders in a collaborative process to re-frame this bill in detail before it moves forward, in the interest of our common goals of making New York a leader in the area of energy efficiency and carbon reduction.