April 6, 2023

RE: Department of Energy and Environment

Budget Oversight Hearing

Hello Councilmember Allen, Councilmember Frumin and Council members of the Committee on Transportation and Environment,

Thank you for the opportunity to testify. My name is Jamoni Overby, and I am the District of Columbia Conservation Advocate for Nature Forward (formerly Audubon Naturalist Society), an organization that has been helping residents of the DMV enjoy, learn about, and protect nature for 125 years. On behalf of our 28,000 members and supporters, I would like to lend support for fully funding the Department of Energy and Environment and its needs. While we are disappointed that projected revenues have led the Mayor to propose budget cuts, including important programs, we understand the fiscal reality. We offer some suggestions for prioritization and concerns about specific cuts that Council should address.

The recent Intergovernmental Panel on Climate Change report made it crystal-clear that what we already knew: tackling the climate crisis is the challenge of this century, and will interact with all others, from ecological to economic to social. Leaders who boldly act to reduce and prepare for climate impacts could truly preserve and create a better world for ourselves and our children. This starts with reducing our greenhouse gas emissions. Council should prioritize and fund actionable initiatives that measurably move the District closer to our ambitious climate goals. That includes reversing delays to BEPS and Zero Waste initiatives, and prioritizing other climate and energy activities for any available funds during this budget period or later in the fiscal year.

ENERGY

To achieve the District’s decarbonization goals, as laid out in the Clean Energy DC Plan, DOEE’s energy programs must continue to drive the following key principles forward: reduce energy consumption by increasing energy efficiency; decarbonize the energy supply by increasing renewable energy resources and improving demand management and energy storage; electrify the building and transportation sectors, rapidly winding down the use of fossil fuels in these sectors; and pursue energy justice, ensuring that the District’s most vulnerable residents receive top priority in the transition to clean energy, while ensuring they can access affordable energy and the health benefits of efficient, green housing.

According to the 2022 Clean Energy DC Progress Report, some successes from the plan include: the Oxon Run Community Solar Installation, DC energy suppliers purchasing over 20% of the city’s needs from renewable sources, and 2,577 new renewable systems added to the District certified for the Renewable Portfolio Standard, totaling 11,700. Let’s work together to continue the progress of decarbonizing DC with adequate funding for BEPS.

BUILDING ENERGY PERFORMANCE STANDARDS (BEPS)

Buildings account for 71% of all greenhouse gasses produced in the District. To reduce emissions from buildings, DC’s Building Energy and Performance Standards (BEPS) program requires that owners of large buildings improve their energy efficiency.

Nature Forward strongly urges you NOT to support the Mayor’s proposed delay in implementation of BEPS as stated in the FY24 Budget Support Act. This is in addition to the 1-year delay that already occurred during the pandemic. We urge you to restore $33 million in federal (not local) funds for implementation of this program that are currently proposed to be allocated to other programs.

It is critical to move forward with the original implementation date because this significant delay would mean that the District may not meet our target goals to reduce greenhouse gas emissions. In other words, we would not meet the goals mandated in Title III of the  Clean Energy DC Omnibus Act of 2018. In terms of the human cost, the District’s low-income communities and communities of color— frontline communities—are suffering the worst impacts of climate change, and those disproportionate impacts will continue unless the Councilmembers and Mayor act now. Reducing emissions in DC cannot wait.

We understand that over 300 submissions for BEPS pathway selection have been submitted by developers, and positive conversations are occurring with downtown developers. Developers are ready to move on BEPS and there is no reason to delay implementation on their behalf.

It is imperative that energy efficiency upgrades move our large buildings away from the use of fossil fuels as soon as possible. Installation of new, higher-efficiency gas boilers may enable building owners to achieve compliance with BEPS in the first compliance cycle-- but these new gas systems could remain in place for several decades, continuing to emit greenhouse gasses and hampering the District’s ability to transition away from the use of methane gas, a transition that is necessary to achieve our climate goals. BEPS should be achieved solely through electrification to clearly distinguish the transition the District has committed to.

Besides the private sector, Nature Forward is concerned that the implementation of BEPS in DC government buildings is severely behind schedule. The Department of General Services (DGS) Strategic Energy Management Plan (SEMP) provides the roadmap for improving energy efficiency in DC government buildings and complying with BEPS. The projected cost of implementation through several compliance cycles could be as much as $300 million. While this is a significant sum, it should not be a barrier to complying with BEPS because BEPS will reduce energy expenditures and save taxpayers money for decades to come. Also, improvements in building energy efficiency will create a more comfortable environment in DC’s schools, recreation centers, and government buildings for school children, teachers, government workers, and all community members who use these public buildings.

Therefore, it is essential that the Council provide DOEE with robust funding in the DGS budget for BEPS implementation. DOEE is responsible for the implementation of BEPS in all non-governmental buildings. Given the slow pace of DGS in upgrading government buildings, DOEE with its expertise in regulation may be able to help. However, DOEE should not be burdened with the funding and implementation of BEPS for DC government buildings without additional capacity and funding, which should come out of the DGS budget as a transfer.

Councilmember Allen, Nature Forward urges you to coordinate with Councilmember Robert White and the Committee on Government Operations and Facilities to ensure that the BEPS funded in is not swept to other programs and the implementation is not delayed.

BUILDING ELECTRIFICATION

DC cannot achieve carbon neutrality without transitioning away from using fossil fuel combustion to heat buildings and power appliances. We thank you, Councilmember Allen for introducing the Healthy Homes for All bill. In December 2023, Pepco confirmed that its power grid could support greater electrification, so there is no reason for DOEE to delay initiating an electrification program. We believe the electrification program should focus on low- and moderate-income households and include both rental housing and homeowners. To date, DOEE has not initiated a home electrification program. The DC Sustainable Utility (DCSEU) has created a small Low-Income Decarbonization Pilot. Nature Forward applauds DCSEU for this pilot program, and we believe DOEE’s building electrification efforts should scale on this pilot program and focus on homes that can be electrified. The electrification effort should be scaled up significantly, covering far more homes and with substantial outreach about both the energy and climate benefits of the program and the health threats from burning fossil fuels in our homes.

ENERGY AFFORDABILITY DIVISION

Nature Forward strongly supports the budget and activities of the Energy Affordability Division, including the Weatherization Assistance Program, the Low-Income Home Energy Assistance Program (LIHEAP), assistance with water utility bills, and remediation of lead and mold. We recognize that much of this funding comes from federal sources. To the extent that federal funds fall short of the needs in the District, we encourage the use of local funds to close the gaps. No DC resident should be forced to live without heating, cooling, or water. Nor should any DC resident be forced to live with lead or mold contamination.

ZERO WASTE INITIATIVE

Nature Forward understands that zero waste is critical to the health of DC residences, neighborhoods, and natural resources. To reach the goal of diverting 80 percent of solid waste away from landfill and waste-to-energy by 2032, the final Zero Waste DC Plan must be released as planned in Spring 2023, and fully funded with budget and staff. It is difficult to comment on the full plan until we can review the details. We are happy that signups for the Composting pilot for single households and buildings with 3 or less units will begin on April 22. This is a small step forward.

Thank you for the opportunity to testify.

Jamoni Overby

DC Conservation Advocate, Nature Forward

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