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**Subject:** Comments on RGGI Operating Plan  
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To Whom it May Concern,

Please consider the following comments on NYSERDA's RGGI Operating Plan Amendment for 2021:

It is essential to me and my community that the RGGI Operating Plan be fully aligned with the equity requirements of New York State's climate law—The Climate Leadership and Community Protection Act—and that the funds fulfill their purpose and are not directed elsewhere.

RGGI funds will be an important part of expanding good green jobs in New York and lowering energy bills during this uniquely difficult time in the state's history. Disadvantaged communities are being hit hardest by the pandemic and climate impacts and need lasting relief. New York State will need to continue leading the nation by example by not only ensuring these funds are going toward their intended purposes but that they are also being spent in the communities that need investment most. The benefits of spending money in disadvantaged communities is a much higher commitment than the concept of the benefits being "realized" in disadvantaged communities as articulated in the draft plan.

I also oppose the assumption in the amendment that the Legislature will seek a transfer of RGGI funds for the state's general fund and/or to support programs of the Environmental Protection Fund. Over the course of the program, \$228 million of RGGI funds have been pulled out of the RGGI program to the state General Fund, depriving New Yorkers of funding that could have lowered energy bills and created good jobs. In light of the tremendous needs for pollution reductions in disadvantaged communities, the past raids of RGGI funds must now come to an end.

NYSERDA should also cease incentivizing dirty heating fuels such as biomass and wood, start incentivizing clean technologies such as air source heat pumps (not only ground source HPs, which are prohibitively expensive even with incentives), which meet the goals of CLCPA and do not pollute the air when electricity is provided by clean sources. NYSERDA should, per CLCPA, be working toward a clean economy, and tech jobs around industries such as wind, solar, and ASHPs are the future it should be promoting. This also meets the charge to protect community health, which is directly, negatively affected by wood burning.

Thank you for taking these concerns into consideration.

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