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To: erda.sm.rggiprograms
Subject: Comments on RGGI Operating Plan
Date: Tuesday, January 5, 2021 3:10:01 PM

Dear sir or madam,

I am commenting on NYSERDA's RGGI Operating Plan Amendment for 2021:

New York State has shown itself a leader, with passage of the Climate Leadership and Community Protection Act, which is great.

But the key is appropriate implementation, including application of funds in areas where they are most needed and most needed in the immediate term. The new law encompasses equity requirements, and the RGGI Operating Plan must align fully with those requirements.

Sadly, we are dealing with multiple crises these days, and those crises — especially the pandemic and the destructive effects of climate change — hit the same people the hardest, i.e., our disadvantaged communities. They need real and lasting relief.

New York State needs to continue leading the nation by example, in this case, by both ensuring that these funds go toward their intended purposes and that they are spent in the communities that need investment the most.

Direct spending in disadvantaged communities is a much higher and more meaningful commitment than the idea of the benefits being “realized” in disadvantaged communities as articulated in the draft plan. I don't buy into that concept and don't believe anyone else should either.

Further, I 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.

Already, \$228 million 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, raids of RGGI funds must end now.

Thank you for taking these concerns into consideration.

Nadine Godwin

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