

MTA Written Comments in Support of NYPA
on the
Draft Operating Plan for Investments in New York under the CO2 Budget Trading
Program and the CO2 Allowance Auction Program
March 23, 2009

The Metropolitan Transportation Authority (MTA) is writing in support of the comments submitted by the New York Power Authority (NYPA) regarding the Draft Operating Plan for Investments in New York under the CO2 Budget Trading Program and the CO2 Allowance Auction Program.

The MTA concurs with NYPA's proposal to dedicate RGGI funds to NYPA through their existing Energy Services Program. NYPA has a proven track record of identifying, designing and executing energy efficiency projects with their governmental customers, including the MTA and its constituent agencies - New York City Transit, Long Island Rail Road, Metro-North Railroad, MTA Bus, Long Island Bus, MTA Bridges and Tunnels and the MTA Capital Construction Company. NYPA personnel are already experienced with the complex operations and processes of the MTA, and have executed more than \$60 million dollars worth of projects in partnership with the MTA, resulting in annual energy saving of greater than 72,000,000 megawatt hours/year (the equivalent of over 30,000 metric tonnes of CO2).

By using RGGI funds to enhance the existing Energy Services Program, NYPA will be able to leverage these funds with their own financing and engage in high carbon impact projects that would otherwise not be economically viable based upon energy saving alone, such as the replacement of old, dirty boilers and burners with new high-efficiency units. In this way, the RGGI goal of reducing carbon emissions will, itself, be enhanced.

The MTA agrees that one of the most effective and efficient processes to increase energy efficiency and reduce carbon emissions under RGGI would be to award a significant portion of auction proceeds directly to NYPA's Energy Services Program, which would then allocate the funding to NYPA customer projects.