

On behalf of the New York City Housing Authority (NYCHA), I would like to respond to NYSERDA's RGGI Operating Plan (the "Plan").

The Plan seems to contemplate excluding New York Power Authority customers from fully partaking of all aspects of RGGI funded programs. The Plan appears to perpetuate a misunderstanding on the part of NYSERDA that NYPA provides its customers, such as NYCHA, with electricity-efficiency incentives and/or subsidizes demand-side programs, and that the RGGI funds should only be directed at NYPA customers' fossil fuel related carbon reduction measures.

NYPA does provide below-market electricity production to its customers. It also operates an effective Energy Services Program which provides turkey demand-side energy-efficiency projects to its customers and offers low-cost lending for these projects. NYPA does not in any way, however, subsidize these programs. It always prices its activities to recover the full cost of any service it provides to its customers.

Thus, the notion that NYPA customers such as NYCHA should be in any way ineligible for any strand RGGI funding make no sense whatsoever. NYCHA has a robust capacity to perform energy-efficiency activities in its vast building portfolio and there are a great many opportunities to use RGGI funding to reduce NYC public housing's carbon footprint.

Thanks.

Lloyd Kass
Director, Energy Department
New York City Housing Authority
90 Church Street, 6th Floor
New York, NY 10007
lloyd.kass@nycha.nyc.gov
(212) 306 4691 (office)
(917) 716 7813 (mobile)