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Gavin J. Donohue, *President &
Chief Executive Officer*

May 21, 2015

Via email at rggiprograms@nysesda.ny.gov

Mr. John B. Rhodes
President and Chief Executive Officer
New York State Energy Research and Development Authority (NYSERDA)
17 Columbia Circle
Albany, New York 12203-6399

Dear President Rhodes:

IPPNY appreciates the opportunity to provide written comments¹ on the 2015 New York State Regional Greenhouse Gas Initiative (RGGI) draft Operating Plan Amendment, as a follow-up to the meeting of the RGGI Stakeholder Group on April 30, 2015. The Plan Amendment continues to provide only \$14.5 million for the Competitive Greenhouse Gas Reduction Program to reduce emissions directly at power plants. This funding is in the process of being distributed via a Request for Proposals # 2857, which was issued at the end of December last year.

After NYSERDA makes awards pursuant to this RFP, IPPNY suggests that NYSERDA host a follow-up meeting with potential bidders, including those that expressed an interest in the program but did not submit applications in response to the RFP, in order to discuss the program further and ways to improve it.

IPPNY continues to urge NYSERDA to provide additional RGGI money to the program to allow more projects to be developed. Indeed, the 2011 RGGI Operating Plan Amendment contained a provision that recommended the acceleration and expansion of funding for the program. Originally, the 2009 Plan intended to provide a three-year budget for the program of approximately \$41 million.

¹ All of the views expressed in IPPNY's comments do not necessarily represent the positions of each of our Members, since IPPNY represents a broad spectrum of companies. We anticipate some of our Members also may submit comments on their own.

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Thank you for your consideration. We look forward to continuing to work with you on opportunities to support energy investment in New York State.

Sincerely,

Gavin J. Donohue
President & CEO

Cc: Richard L. Kauffman, Chairman of Energy & Finance for New York and Chairman of
NYSERDA's Board of Directors

Kara Allen, Assistant Secretary for Energy