

January 9, 2026

New York State Energy Research and Development Authority
ATTN: 2026 Draft RGGI Operating Plan Amendment
17 Columbia Circle
Albany, NY 12203-6399

Submitted by email via rggiprograms@nyserda.ny.gov.

Re: 2026 Draft Regional Greenhouse Gas Initiative (RGGI) Operating Plan Amendment

Clean Air Task Force, Inc. (“CATF”) respectfully submits these comments on the 2026 Draft Regional Greenhouse Gas Initiative (RGGI) Operating Plan Amendment, with specific focus on the proposed use of RGGI funds to support large-scale electricity generation programs in New York State. These comments address the inclusion of early-stage investments to support offshore wind and advanced nuclear energy development through the proposed Offshore Wind Predevelopment Support Program. They are not intended to represent a comprehensive comment on the full Operating Plan or all potential uses of RGGI proceeds.

CATF is a nonprofit organization dedicated to advancing the policy and technology changes necessary to achieve a zero-emissions, high-energy planet at an affordable cost. With more than 25 years of internationally recognized expertise in environmental policy and law, and a commitment to evaluating all viable solutions, CATF is a pragmatic, non-ideological organization focused on enabling durable, cost-effective climate outcomes. CATF has offices in Boston, Washington, D.C., and Brussels, with staff working remotely across the United States and internationally.

CATF commends New York for its continued leadership in climate and clean energy policy and for its strategic approach to deploying RGGI proceeds to address emerging benefits to clean electricity development. The proposed Large-Scale Generation Programs reflect a recognition that meeting the state’s long-term climate targets will require not only sustained clean energy deployment, but also early, targeted investments that reduce project risk, improve cost certainty, and accelerate timelines for large, capital-intensive clean energy resources, including offshore wind and advanced nuclear energy.

CATF supports the proposal to use RGGI funds to advance early-stage development activities for offshore wind and advanced nuclear generation in New York. Dispatchable, high capacity factor, zero-emission resources will be necessary to New York’s portfolio of clean energy resources as the state moves toward a fully decarbonized electricity system¹.

¹ <https://energyplan.ny.gov/>

Strategic public investment at the pre-development stage can meaningfully reduce first-of-a-kind risk, improve price certainty, minimize interest payments for project capital, and position investments in projects to access available federal incentives, ultimately lowering long-term costs for ratepayers. And as federal roadblocks heighten uncertainty in the offshore wind industry, New York's strategic investments in this sector can reduce developer risk, preserve progress already made on in-state workforce development and manufacturing, and proactively address planning, enabling infrastructure, and capacity needs.

In addition to supporting project development, CATF strongly supports directing RGGI funds toward nuclear supply chain and workforce investments that can be hosted within New York State. While assessments of the advanced nuclear supply chain identify acute constraints in ultra-heavy forgings, a state like New York can leverage existing industries to manufacture supporting components, provide quality assurance and inspection services, engineering and project management capabilities, and the development of skilled trades such as welding, machining, and electrical work. These segments of the supply chain and workforce align well with New York's existing industrial base, labor force, and educational institutions, and present meaningful opportunities for durable, export-oriented economic development for the state.

Offshore-generated electrons are critical to a clean downstate grid, but even before the hurdles imposed by the current federal administration, the offshore wind industry faced cost, inflation, and supply chain challenges. Today, federal stop work orders and refusal to permit offshore wind projects during this administration compound those initial challenges and have hindered the state-level, proactive planning processes (e.g., the Public Policy Transmission Need [PPTN] process) which will enable the successful and efficient offshore wind system in the future. CATF supports applying RGGI funds toward key pre-development activities that signal state confidence in the industry and continue progress on infrastructure deployment, planning, and workforce capacity. These activities include, but are not limited to (1) developing and preparing identified points of interconnection (POIs), and coordinating with neighboring states on POIs, (2) planning and deploying required upgrades to the onshore grid, (3) supporting the re-establishment of proactive transmission planning processes like the PPTN to most efficiently and cost-effectively bring clean electrons to high-demand areas, and (4) reaffirming and building up in-state workforce development and manufacturing capabilities.

Targeted investments in workforce training, supplier qualification, and manufacturing readiness can help address national bottlenecks while delivering local economic benefits. These investments can support coordination with offshore wind and nuclear workforce

initiatives led by the New York Power Authority, and other state entities, strengthening institutional capacity and ensuring that supply chain growth occurs alongside community engagement and labor development. CATF also notes that early investment in supply chain capacity and site readiness can help break the persistent “chicken-and-egg” dynamic that has historically slowed large-scale electricity generating resource deployment. By reducing uncertainty for private developers and manufacturers, New York can help catalyze private capital investment while retaining flexibility over whether, where, and when projects ultimately proceed, and serve as a model for other states attempting to develop nuclear supply chain development or new nuclear construction.

Looking forward, CATF encourages New York to continue using RGGI proceeds in a manner that is strategic, risk-aware, and aligned with the state’s long-term decarbonization goals. Supporting early-stage advanced nuclear and offshore wind development in parallel with other energy resources reflects a balanced approach that strengthens reliability, enhances economic opportunity, and improves the likelihood of achieving a fully zero-emission electricity system.

CATF appreciates the opportunity to comment on the Draft RGGI Operating Plan Amendment and looks forward to continued engagement with New York State agencies as these programs are further refined and implemented.