

December 9, 2026

Re: Comments on the 2026 Draft RGGI Operating Plan Amendment

I am James Ralston, a prior director of the Bureau of Air Quality Planning at NYSDEC. I retired in 2006 shortly after my Division of Air Resources collaborated in developing the multi-state R.G.G.I. program. I now volunteer with the NYS Citizens Climate Lobby and New Yorkers for Cool Refrigeration Management.

I participated in the development of a letter to NYSERDA President and CEO Doreen Harris, Department of Public Service Chair and CEO Rory Christian, and DEC Commissioner Amanda Lefton dated December 2, 2025 which is attached below. This letter has been approved and signed by many groups and individuals concerned about our changing climate linked weather disasters. We are particularly concerned about those affected in Climate/Environmental Justice Communities.

The CLCPA Scoping Plan identifies introduction of natural refrigerants as a means to achieve meaningful reductions in Greenhouse Gas emissions. This is why our December 2, 2025 letter advocates for a study funded by NYSERDA of the energy conservation benefits of adopting natural refrigerants, such as R290 (refrigerant-grade propane) and R744 (carbon dioxide), in the large scale refrigeration systems used in food establishments. We know that current systems leak a great deal of high Global Warming Potential synthetic refrigerants. The recommended NYSERDA study is to develop hard data to add meaningful electric utility rebates to these typically low capitalized grocers serving Low and Middle Income

Communities. We seek to incentivize the purchase of this new energy saving equipment while sparing these food establishments from conducting a specialized engineering analysis themselves.

I again encourage NYSERDA to design and fund such a study early in this three year plan. Perhaps the inclusion of the note “For better understanding of how related work fits together to support the priorities of the state and stakeholders, this RGGI program brings together like work under two prior RGGI programs: (1) Scoping Plan Implementation Research and (2) Grant Program Match Opportunities” which appears at the bottom of page 4 of this R.G.G.I. Operating Plan Amendment covers this request. If so, I encourage explicitly including such a commitment to be implemented very soon.

Once completed, there are several ways to promote this work which include expanding the Buildings Technical Assistance Programs and New York’s Technical Reference Manual to allow the Joint Utilities to calculate suitable rebates for food stores that adopted natural refrigerants.

Thank you for providing this opportunity to better implement the requirements of the CLCPA law. A copy of the referenced letter dated December 2, 2025 is attached below. Please advise if you need a different format.

Respectfully,
James Ralston

[PERSONAL CONTACT INFORMATION REDACTED]

