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— NEW YORK STATE —  
ASSOCIATION OF COUNTIES

**NY  
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Doreen M. Harris  
President and Chief Executive Officer  
New York State Energy Research & Development Authority  
17 Columbia Circle  
Albany, NY 12203-6399

**RE:** Comments on the New York's Regional Greenhouse Gas Initiative 2026 Operating Plan Amendment

Dear Ms. Harris:

On behalf of the New York State Association of Counties (NYSAC), the New York Conference of Mayors (NYCOM), and the New York Association of Towns (NYAOT), we thank you for the opportunity to comment on the proposed 2026 Regional Greenhouse Gas Initiative (RGGI) Operating Plan Amendment. Our associations represent local governments across New York State that are on the frontlines of delivering clean energy solutions, reducing greenhouse gas emissions, and building community resilience.

Local governments play an indispensable role in achieving the ambitious goals established by the Climate Leadership and Community Protection Act. Counties, cities, towns, and villages reduce emissions through electrifying municipal fleets, retrofitting buildings for energy efficiency, deploying renewable energy, and making transportation systems more sustainable. Local governments advance equity and climate justice by directly engaging with vulnerable populations and working to improve air quality, enhance health outcomes, and deliver climate benefits to underserved areas. As the closest level of government to residents and businesses, local governments are uniquely positioned to support building decarbonization, facilitate community solar projects, and ensure that the clean energy transition is affordable and accessible to all New Yorkers. Counties and municipalities also support job creation and economic development by collaborating with academic institutions and workforce development boards to train workers for jobs in emerging green industries. With this experience and deep understanding of community needs, local governments provide invaluable insights to ensure successful strategic planning and project execution.

The RGGI program has been instrumental in supporting local government efforts to reduce greenhouse gas emissions, transition to clean energy, and build resilient communities. The auction proceeds from this market-based program provide critical

funding that enables counties, cities, towns, and villages to undertake clean energy projects that might otherwise be financially unfeasible. As the state works to achieve the goals outlined in the Climate Leadership and Community Protection Act, local government participation and leadership remain essential to success.

We commend NYSERDA for organizing the 2026 Operating Plan Amendment around four core themes: Affordability; Energy Abundance, Diversity, and Reliability; Energy Innovation and Economic Development; and Thriving Communities and Environments. These themes align well with state priorities and local government needs. We appreciate the proposed allocation of 62% of planned RGGI investments toward affordability programs, recognizing that energy costs remain a significant concern for many New Yorkers, particularly low- and moderate-income households.

The following comments highlight our support for specific programs within the 2026 Operating Plan Amendment and offer recommendations to strengthen local government capacity and ensure that RGGI investments maximize benefits for communities across New York State.

## Strong Support for Clean Energy Communities Program

We strongly support the continued investment of \$31 million over the next three fiscal years (FY26-27, FY27-28, and FY28-29) in the Clean Energy Communities (CEC) Program. Since its inception in 2016, CEC has been instrumental in supporting county and municipal clean energy initiatives by providing match-free grants and specialized technical assistance. Over 900 local governments participate in the program, and more than 600 have become Designated Clean Energy Communities by completing at least four high-impact actions. To date, CEC has helped local governments across the state deploy over 5,000 activities to conserve energy and reduce costs.

The CEC program has unique advantages that warrant its continued robust funding. Unlike other programs that require a 50% local match, CEC provides match-free grants that remove significant financial barriers for local governments. This feature enhances accessibility and feasibility of projects, allowing municipalities to allocate resources more effectively without the political challenges of securing additional local funding. Match-free grants streamline decision-making and increase the likelihood that vital clean energy projects are undertaken.

Equally important are the dedicated regional CEC coordinators who possess specific expertise required to guide clean energy projects from conceptual stages to successful completion. These coordinators help local governments avoid common pitfalls that

might otherwise stall important energy initiatives. Their role extends beyond technical advice—they have spent years actively engaging with local governments to build trust and rapport. These relationships and dedicated support accelerate project timelines and enhance the quality of outcomes.

We support NYSERDA’s plan to deepen community clean energy work by motivating implementation of additional high-impact actions via rewards-based grants. We also appreciate the cohort-based model of engagement referenced in the Operating Plan Amendment. We urge that any cohort activities be designed to minimize administrative burden on already-stretched municipal staff and that participation be voluntary and flexible to accommodate varying local capacity levels.

## Support for EmPower+ Program

We support the proposed \$240.9 million investment in the EmPower+ Program over the next three fiscal years. EmPower+ provides comprehensive energy efficiency and electrification services for low- to moderate-income households, helping families reduce energy costs while contributing to the state’s decarbonization goals. With an estimated 90% of this funding anticipated to benefit disadvantaged communities, EmPower+ represents one of the most impactful equity-focused programs in the RGGI portfolio.

Many low- and moderate-income households face significant barriers to participating in energy efficiency programs because they cannot afford necessary pre-weatherization improvements such as roof repairs, electrical upgrades, and mold remediation. We urge NYSERDA to ensure that EmPower+ addresses these health and safety barriers so that homes are properly prepared to receive efficiency upgrades and electrification measures. Pre-weatherization support is essential to achieving meaningful energy savings and ensuring that the benefits of clean energy reach those who need them most.

## Support for Agrivoltaics Research Program and Farmland Protection

We support the proposed \$10 million investment in the Agrivoltaics Research Program. New York’s agricultural sector is a major economic driver and essential to food security. As solar and wind energy projects expand across the state, protecting farmland from development pressures has become increasingly important. Agrivoltaics—which allows agricultural production alongside solar energy generation—represents a promising dual-use strategy that can diversify farmer incomes while supporting clean energy goals.

We encourage NYSERDA to use this funding to support and expand research and demonstration projects across a range of agricultural commodities and regions. Data

collection on agricultural productivity, energy generation, incremental costs, lessons learned, and best practices should be published and communicated through established stakeholder networks. These findings will be critical to developing viable models that can be scaled.

More broadly, we continue to advocate for incentives that encourage renewable energy projects on non-agricultural lands such as rooftops, parking lots, and brownfields rather than prime farmland. Development pressures from renewable energy projects could harm long-term agricultural viability if not carefully managed. When agricultural land is used for renewable energy, dual-use strategies like agrivoltaics should be the preferred approach to maintain agricultural production alongside energy generation.

## Support for Clean Transportation Programs

We support the proposed \$164 million investment in Clean Transportation programs over the next three fiscal years. Local governments play a critical role in demonstrating the feasibility and benefits of transportation electrification through municipal fleet conversion and supporting infrastructure deployment in their communities.

We appreciate that RGGI funding will support continued operation of the Drive Clean Rebate Program for electric vehicles and the New York Truck Voucher Incentive Program for zero-emission trucks. These rebates help reduce upfront costs and accelerate adoption. We also support investment in fleet electrification plans that provide guidance to truck and bus fleets, including school bus fleets.

Local governments need continued support to electrify municipal fleets when practicable. Converting municipal fleets not only reduces emissions from the transportation sector but also demonstrates benefits and feasibility to the public, building awareness and support for broader electrification efforts. We encourage NYSERDA to ensure that local governments have access to technical assistance and financial support for fleet planning and infrastructure development.

## Strong Support for Clean Energy Workforce Development

We support the proposed \$60 million investment in Clean Energy Workforce Development over the next three fiscal years. A successful clean energy transition requires a skilled workforce, and workforce development programs are essential to upskilling existing workers and bringing new workers into the clean energy economy. We particularly appreciate the focus on helping fossil fuel workers transition to other jobs and providing opportunities for workers from disadvantaged communities.

The proposed activities—including clean energy training for large-scale renewables, energy storage, and electric vehicle charging infrastructure; wrap-around support for disadvantaged community residents; pre-apprenticeship programs with direct entry to union apprenticeships; and K-12 career awareness programs—represent a comprehensive approach to building the workforce needed to achieve state climate goals. We encourage NYSERDA to coordinate these efforts with regional clean energy hubs, community colleges, and workforce development boards to maximize impact and ensure that training programs align with local industry needs.

## Strong Support for Clean Energy Siting Technical Assistance for Local Governments

We strongly support the proposed \$10 million investment in the Clean Energy Siting Technical Assistance for Local Governments Program. Local governments are frequently asked to review and respond to renewable energy project proposals, yet many lack the technical expertise and resources to thoroughly evaluate these projects and their potential impacts on communities. This program provides critical technical assistance to help local governments make informed decisions about clean energy development.

We appreciate that NYSERDA will continue expanding locally-based technical support networks, providing training opportunities for local governments, and offering public-facing educational forums across the state in accordance with requirements outlined in the Accelerated Renewable Energy Growth and Community Benefit Act (SITED Act). These resources help level the playing field and ensure that local governments can meaningfully participate in clean energy siting processes.

We encourage NYSERDA to prioritize technical assistance that helps local governments steer projects away from prime farmland and environmentally sensitive areas. Siting decisions have long-term implications for agricultural viability, natural habitats, and community character, and local governments are best positioned to understand these local considerations and balance clean energy goals with protection of valuable agricultural and environmental resources. Technical assistance should help communities identify preferred locations for renewable energy development, such as rooftops, parking lots, brownfields, and other previously developed sites.

Furthermore, we recommend that this program include resources to help local governments develop and implement comprehensive plans that address renewable energy siting proactively rather than reactively. Proactive planning can reduce conflicts, streamline permitting processes, and ensure that renewable energy development aligns with local priorities and values.

# Additional Recommendations

## Enhance Coordination and Reduce Administrative Burden

New York State has many programs that support local government efforts to mitigate and adapt to climate change. However, the dispersed nature of these programs across different agencies and departments can create confusion and inefficiencies. We recommend that NYSERDA work with partner agencies to streamline access to clean energy programs and create a centralized resource portal where local governments can easily find tailored guidance, funding opportunities, regulatory news, and expert assistance specific to their needs.

## Prioritize Rural and Economically Distressed Communities

While we support the prioritization of disadvantaged communities (DACs) throughout the RGGI portfolio, we urge NYSERDA to ensure that rural and economically distressed areas that may not meet DAC criteria also receive adequate support. Only 15% of rural census tracts are designated as DACs compared to 26% of suburban tracts and 47% of urban tracts. Rural communities face significant barriers to transitioning to a clean energy economy, including limited technical capacity, workforce availability, and infrastructure. A broader approach to eligibility will help ensure an equitable distribution of resources and prevent rural communities from being left behind in the clean energy transition.

## Conclusion

Thank you for the opportunity to provide feedback on the 2026 RGGI Operating Plan Amendment. Local governments are essential partners in achieving New York State's climate goals, and RGGI funding provides critical support that enables counties, cities, towns, and villages to undertake clean energy projects that benefit their communities and contribute to statewide emissions reductions. The success of the Climate Act depends on robust local government engagement, and the strategic use of RGGI proceeds to build capacity at the local level.

We strongly support continued investment in the Clean Energy Communities Program, EmPower+, the Agrivoltaics Research Program, Clean Transportation, Clean Energy Workforce Development, and the Clean Energy Siting Technical Assistance for Local Governments Program. These programs reflect the diverse needs of local governments and the communities they serve, and they align with state priorities to achieve affordability, energy abundance, economic development, and thriving communities. We encourage NYSERDA to use the Clean Energy Siting Technical Assistance Program to

help steer projects from prime farmland and invest in strategies to protect agricultural resources.

We appreciate your consideration of these comments and look forward to continued collaboration as New York State works to build a clean, affordable, and resilient energy future for all.

Sincerely,

New York State Association of Counties (NYSAC)

New York Conference of Mayors (NYCOM)

New York Association of Towns (NYAOT)