

January 9, 2026

NYSERDA
rggiprograms@nyscrda.ny.gov

RE: Public Comment in Support of Expanded EmPower+ Funding to Lower Energy Bills for New Yorkers

Dear NYSERDA Board of Directors,

New York Lawyers for the Public Interest (NYLPI) writes to express its support for the 2026 Draft RGGI Operating Plan Amendment presented at the December 18, 2025 RGGI stakeholder meeting, which proposes a significant increase in funding for the EmPower+ program for the next three years.

NYLPI is a legal civil rights organization that advocates for environmental, disability, and health justice for all New Yorkers. NYLPI works toward a New York where all people can thrive in their communities, with quality healthcare and housing, safe jobs, good schools, and healthy neighborhoods. The communities we serve are comprised of low- and moderate-income individuals who struggle to keep up with high costs of housing and utility bills, and who disproportionately bear the impacts of climate change and dangerous air pollution caused by greenhouse gas emissions.

About half of New York households are low-to-moderate income (LMI) households.¹ NYLPI supports expanding funding for the EmPower+ program, which helps LMI households save energy and money toward energy improvements made to their primary residence by providing eligible households with home energy assessments to reduce energy waste and lower energy usage, and by providing funding towards the cost of energy efficiency and electrification

¹ New York State Climate Action Council Scoping Plan, Chapter 12 Buildings, Page 175: “In addition, nearly half (48%) of households statewide are low-to-moderate income households, underscoring the importance of careful attention to housing and energy affordability.”

improvements (such as insulation, heat pumps, and electrical upgrades). These types of electrification and energy efficiency strategies are key to driving energy savings in residential buildings and supporting the reliability of the state’s electric grid.² The EmPower+ program provides critical funding to support such energy efficiency and weatherization measures, which bring down energy costs for LMI households.³ This is particularly important in light of recent rate hikes from utility providers.

Such funding directly supports New York’s ability to achieve the goals set by the Climate Leadership and Community Protection Act (CLCPA), including a 40% reduction in statewide greenhouse gas emissions (from 1990 levels) by 2030, while prioritizing the reduction of pollution in disadvantaged communities and directing at least 35% of benefits go to such communities.

NYLPI urges the NYSERDA Board of Directors to demonstrate its commitment to the goals of bringing down energy costs for New Yorkers while minimizing the environmental impacts of the state’s energy systems by approving the proposed funding expansion for EmPower+ at the Board meeting on January 26, 2026. Thank you for your consideration.

Respectfully,
New York Lawyers for the Public Interest
Environmental Justice Program
Caroline Chen, Director
Audie Soucy, Staff Attorney

² 2025 State Energy Plan, Volume II, Chapter 8 Buildings, page iv: “As the building sector transforms, the use of efficient heat pumps will increase... Increased levels of energy efficiency and weatherization measures will result in lower per-capita energy usage across the sector, helping to provide energy savings for many residents... Collectively, these strategies will bring about a modern, low-carbon building stock that delivers a multitude of public health, safety, affordability, and resiliency benefits to New Yorkers.”

³ Public Service Commission, Order authorizing Low-to-moderate income energy efficiency and building electrification portfolio for 2026-2030, Issued and Effective: May 15, 2025, Case 25-M-0249, Page 54: “The focus on reducing energy consumption by prioritizing energy efficiency and weatherization will help to advance the Commission’s Energy Affordability Policy, which sets a goal for low-income customers to pay no more than six percent of their annual income towards utility costs. Energy Efficiency and weatherization are no-regrets investments and the logical first step to decarbonize a home.”