



January 9, 2026

To:

Doreen Harris, President & CEO
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, NY 12203-6399

VIA ELECTRONIC FILING

RE: New York's Regional Greenhouse Gas Initiative Operating Plan Amendment for 2026

Dear President Harris,

The New York League of Conservation Voters (NYLCV) would like to express our strong support for New York's Regional Greenhouse Gas Initiative (RGGI) Operating Plan Amendment for 2026. NYLCV is a statewide, nonpartisan environmental organization that educates and mobilizes New Yorkers to advance clean energy and protect public health. As an organization that has championed the expansion of renewable energy—including offshore wind—we view RGGI as a cornerstone of New York's climate strategy and an essential tool for delivering tangible environmental, economic, and community benefits across the state.

We commend the leadership of the Department of Environmental Conservation (DEC) and the New York State Energy Research and Development Authority (NYSERDA) for their ongoing stewardship of RGGI. The program has significantly reduced greenhouse gas emissions, improved air quality, strengthened grid reliability, and supported job creation in communities statewide. NYSERDA's statutory role to fund "energy efficiency, renewable or non-carbon emitting technologies, and innovative carbon emissions abatement technologies with significant carbon reduction potential" directly advances New York's climate mandates. The proposed Operating Plan Amendment for 2026 aligns with these objectives, and NYLCV strongly supports its adoption.

NYLCV particularly supports the proposal under the Large-Scale Generation Programs, including the creation of a new Offshore Wind Predevelopment Support Program. As a leading statewide voice for offshore wind, NYLCV has been actively engaged in coalition-building, public education, and outreach to ensure New Yorkers understand the environmental and economic benefits of these projects. Accelerating responsible offshore wind development is critical to meeting the Climate Leadership and Community Protection Act (CLCPA) requirements. RGGI-funded predevelopment support is a strategic investment that will reduce project uncertainty, maintain momentum in the state's offshore wind pipeline, and give developers the confidence needed to continue advancing projects that deliver clean energy, good-paying jobs, and economic growth across New York.

This cost-sharing mechanism will benefit ratepayers by lowering total project costs, reducing future bid prices, and strengthening New York's competitiveness in the global offshore wind market. Ensuring projects advance efficiently also supports stable, affordable clean energy for all New Yorkers while achieving the grid reliability and emissions reductions required to meet the CLCPA's 70x30 and 100x40 targets. These investments directly align with NYSERDA's mandate to support "renewable or non-emitting technologies" and will help New York follow through on its ambitious climate commitments.

NYLCV also emphasizes the importance of sustaining the substantial progress New York has made in building the offshore wind industry. State leadership—from critical infrastructure investments like Propel NY, the Brooklyn Clean Energy Hub, and the South Brooklyn Marine Terminal, to partnerships with labor, industry, and communities—has brought billions in investment and meaningful economic benefits statewide. As an organization deeply engaged in coalition-building and public engagement around offshore wind, NYLCV strongly believes that allowing momentum to stall during a period of federal uncertainty would jeopardize years of progress and make future development far more difficult.

We appreciate the opportunity to participate in the RGGI review process and urge the State to adopt the Offshore Wind Predevelopment Support Program as proposed. This amendment reflects the forward-looking, strategic investments New York must continue to make to meet its climate goals, protect public health, and build a robust clean energy economy for all New Yorkers.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'Julia Damiano', with a long horizontal flourish extending to the right.

Julia Damiano
Clean Energy Campaign Manager
New York League of Conservation Voters