



VIA ELECTRONIC FILING

January 9, 2026

NYSERDA
17 Columbia Circle
Albany, NY, 12203-6399

Re: Comments of New York Solar Energy Industries Association on the Proposed Amendment to the Regional Greenhouse Gas Initiative Operating Plan

To Whom it May Concern,

New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to provide comments in response to the Proposed Amendment to the Regional Greenhouse Gas Initiative Operating Plan.

Attached please find our comments. Feel free to contact me if you have any questions.

Thank you.

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Comments of New York Solar Energy Industries Association in response to New York's Regional Greenhouse Gas Initiative Operating Plan Amendment for 2026

January 9, 2026

Introduction

New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to provide feedback on the 2026 amendment to the Regional Greenhouse Gas Initiative (RGGI) Operating Plan. We commend NYSERDA for its continued commitment to advancing affordability and equity in the clean energy transition, particularly through programs that prioritize low- and moderate-income households and disadvantaged communities. These efforts reflect an important recognition that lowering energy costs and expanding access are central to New York's climate and economic goals.

While the RGGI Operating Plan includes smart investments, it largely excludes solar and energy storage; technologies that are proven investments with smart returns for New Yorkers. Solar is the cheapest form of electricity on Earth, and when paired with energy storage, rooftop and community solar represent the most powerful tools we have to achieve broad energy affordability and resilience. Despite this fact, recent policy decisions have undermined progress: in 2025, the Public Service Commission rescinded \$271 million of previously authorized NY-Sun funds, the U.S. Environmental Protection Agency cut a \$249 million award to NYSERDA from the Solar for All program, and federal incentives for rooftop and community solar are now beginning to phase out. These setbacks come at a time when our industry not only delivers affordability but also drives economic growth—supporting 18,688 jobs statewide in solar and storage alone.

Recent NYSERDA data confirms that distributed solar and storage are among the fastest-growing segments of New York's clean energy economy, making them essential to any strategy that prioritizes affordability and equity.

To sustain this progress, protect thousands of clean energy jobs, and prioritize energy affordability for New Yorkers, NYSEIA encourages New York to invest a meaningful share of RGGI proceeds to strengthen NY-Sun and accelerate energy storage deployment. Doing so will ensure that distributed solar and storage remain accessible to households and communities that need relief the most, while continuing to drive progress toward our decarbonization objectives with reduced support from the federal government and ratepayer-funded programs.

Addressing the Gap in Energy Storage Funding: A Call for Long Island Investment

While NYSERDA's proposed amendment rightly emphasizes affordability, NYSEIA is concerned that the plan allocates no new direct funding for energy storage—a critical omission given the role storage plays in reducing costs, improving reliability, and enabling solar and wind integration. The previous RGGI Operating Plan included modest support for storage, but this amendment leaves a gap that risks slowing progress toward New York's clean energy and affordability goals.

Long Island is the most urgent case for action. The region faces some of the highest electricity prices in the state and relies heavily on aging fossil-fueled peaker plants. Studies have shown that replacing these plants with battery storage could save customers hundreds of millions of dollars over the next decade while reducing emissions and improving grid reliability.¹

While Long Island currently offers residential energy storage incentives and Long Island projects can participate in the statewide utility-scale energy storage procurements administered by NYSERDA, Long Island is currently the only major utility service area without a Retail battery energy storage system (BESS) incentive program. In November 2025, NY Department of Public Service issued a memo to the Chair of the NY Public Service Commission regarding PSEG Long Island's 2025 Utility 2.0 Plan Update, including the utility's extremely limited retail BESS proposal. In this memo, DPS Staff "concur with stakeholders that a single 5 MW ESS project is insufficient to meaningfully advance Long Island's retail energy portfolio in alignment with statewide targets...PSEG LI will need to pursue a broader retail energy storage strategy in collaboration with LIPA."²

RGGI is an ideal funding source to help bridge this gap. By dedicating a portion of auction proceeds to retail energy storage incentives on Long Island, NYSERDA can help animate a market for retail BESS in one of New York's most congested and polluted regions.

NYSEIA strongly recommends that the final Operating Plan include a dedicated RGGI funding stream for retail energy storage on Long Island. This investment would deliver immediate affordability benefits, strengthen system reliability, and maintain momentum toward New York's clean energy targets—all while supporting local jobs and economic growth.

Scale Solar Access: Boost NY-Sun Investments for Underserved Households

The current RGGI Operating Plan allocates just \$24 million—approximately 1.7% of total programmatic funding—to NY-Sun, despite its proven track record as New York's most successful clean energy program. This level of investment is misaligned with both the urgency of energy affordability and the demonstrated performance of NY-Sun.

¹ NY-BEST. (2020, October 28). *Study finds energy storage can save Long Island electric customers \$390 million over the next decade*. Retrieved from <https://ny-best.org/news/533517/Study-Finds-Energy-Storage-Can-Save-Long-Island-Electric-Customers-390-million-over-the-Next-Decade.htm>

² Matter 14-01299. New York State Department of Public Service. Review and recommendations regarding the Long Island Power Authority and PSEG Long Island's 2025 Utility 2.0 Plan Annual Update and 2026 Building Efficiency and Electrification Plan. November 2025.

NY-Sun's record speaks for itself. The program delivered the CLCPA's 6 GW distributed solar target more than a year ahead of schedule and is on track—and under budget—to reach the 10 GW by 2030 goal. It has catalyzed billions in private investment, supported thousands of family-sustaining jobs, and expanded clean energy access for low- and moderate-income households and disadvantaged communities. No other initiative in New York's clean energy portfolio delivers such consistent results at such a low cost per unit of energy.

Yet the landscape has shifted dramatically. The PSC's recent rescission of \$271 million in NY-Sun funding, combined with the EPA's \$249 million cut to New York's Solar for All award, has created a significant and immediate shortfall. These setbacks come just as the market faces uncertainty around the federal ITC and as interconnection delays threaten the ability of projects to capture remaining federal incentives. Without supplemental RGGI investment, New York could lose the opportunity to secure federal tax credit value, maintain its solar workforce, and sustain the market segments most vulnerable to federal and state pullbacks.

These gaps are especially acute because several high-impact market segments no longer receive any NY-Sun support at all, or are scheduled to lose state support at the same time federal incentives are waning. Municipal solar projects—traditionally among the lowest-cost ways for public institutions to reduce operating expenses—are now entirely without incentive pathways in most parts of the State. Large projects that serve municipalities or industrial businesses are subject to Prevailing Wage requirements, yet these projects are no longer eligible to receive any Prevailing Wage incentive from NYSERDA. LMI residential customers in the Con Edison service territory no longer receive any dedicated NY-Sun support, despite facing some of the highest energy burdens in the state. Large commercial and industrial rooftops remain an underdeveloped but uniquely beneficial resource, yet through NY-Sun, systems above 750 kW-DC in Upstate NY are not eligible for support, no incentives are offered on Long Island, and incentives in Con Edison territory will be phased out in 2026. Opt-in community solar for mass-market customers is no longer supported, and opt-in community solar for LMI customers will be similarly unsupported in a matter of months, even though these subscriptions deliver some of the clearest and most immediate affordability benefits. Finally, residential incentives have been fully exhausted across the State, leaving households in many regions with no available means to access solar affordably.

For each of these segments, even modest incentive levels would catalyze projects that deliver meaningful bill relief for New York families and businesses while supporting the local workforce. NYSEIA appreciates that the New York Public Service Commission is under pressure to scale back ratepayer-funded programs; however, eliminating NY-Sun funding at the same time federal incentives are being eliminated will undermine the significant progress New York has made building a skilled workforce and industry. RGGI funds are the perfect tool for New York to strategically fill this gap for priority market segments.

For these reasons, NYSEIA urges NYSERDA to substantially increase RGGI allocations to NY-Sun beyond the proposed \$24 million and to focus that support on the market segments that lack any NY-Sun runway. Enhanced RGGI investment can restore incentives for rooftop and community solar in LMI and DAC communities; re-establish a clear pathway for municipal, large rooftop C&I, and opt-in community solar projects; and ensure that households are not stranded

by the withdrawal of federal and state dollars. It can also stabilize the workforce and preserve New York's ability to capture federal ITC value during a period of national uncertainty—delivering both economic and affordability benefits at scale.

Looking ahead, NYSEIA has called for raising New York's distributed solar target to 20 GW by 2035—a goal that reflects both market potential and the scale of affordability benefits solar can deliver. RGGI funding can be a critical lever to keep this trajectory on track.

Simply put: If energy affordability is the priority, NY-Sun should be a central pillar of the RGGI investment plan. No other program offers such a direct, proven pathway to lower bills, empower communities, and sustain clean energy jobs while also delivering the environmental benefits that support New York's long-term climate commitments.

From Lower Bills to Local Jobs: The Workforce Impact of RGGI Investments

Expanding distributed solar and energy storage through RGGI funding is not only an affordability strategy—it is an economic development engine. While NYSERDA's Operating Plan rightly includes workforce development investments, NYSEIA urges that these efforts be closely tied to distributed solar and storage growth, ensuring that increased funding for NY-Sun and retail storage translates into tangible job creation.

According to NYSERDA's 2025 Clean Energy Industry Report³, the solar sector grew by 4% in 2024, adding more than 660 jobs, while energy storage surged by 8%, adding approximately 185 jobs as part of the state's broader grid modernization efforts. Today, distributed solar and storage support 18,688 workers statewide, providing good-paying jobs in installation, engineering, manufacturing, and project development.

To maximize these benefits, NYSERDA should:

- Integrate rooftop solar, community solar, and battery storage skills into workforce training programs, preparing workers for the fastest-growing segments of the clean energy economy.
- Prioritize training and career pathways for LMI and DAC residents, ensuring that affordability investments also deliver equitable economic opportunities.
- Leverage expanded NY-Sun and storage funding to drive job growth, creating a multiplier effect that strengthens local economies and tax bases. Sustaining the market for solar and energy storage is foundational to achieving New York's clean energy workforce goals.

Every dollar invested in distributed solar and storage delivers dual benefits: lower bills for consumers and sustainable jobs for New Yorkers. By aligning workforce development with expanded NY-Sun and retail storage incentives, NYSERDA can ensure that affordability and economic opportunity advance together.

³ New York State Energy Research and Development Authority. (2025). *2025 New York Clean Energy Industry Report* [PDF]. NYSERDA.

<https://www.nyserdera.ny.gov/About/Publications/New-York-Clean-Energy-Industry-Report>

Conclusion

New York stands at a crossroads. Energy insecurity is no longer a distant risk—it is a daily reality for families across the state. At the same time, we have the tools to change that story.

Distributed solar and storage are not abstract technologies; they are proven solutions that slash energy bills, strengthen resilience, and create thousands of good-paying jobs. They are central to a direct, scalable path to affordability for all New Yorkers.

RGGI funding is a powerful lever. How we deploy it will determine whether we accelerate toward an affordable, reliable clean energy future—or allow recent setbacks to stall progress. By expanding NY-Sun funding, dedicating resources to retail storage on Long Island, and investing in workforce development, NYSERDA can ensure that this Operating Plan delivers on its promise: to make clean energy not just a climate solution, but an affordability solution for every household in New York.

For questions, comments, or follow up, please contact:

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