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**From:** New Yorkers for Cool Refrigerant Management <ny4cool@gmail.com>  
**Sent:** Friday, January 9, 2026 4:35 PM  
**To:** erda.sm.rggiiprograms  
**Subject:** Comments on the 2026 Draft RGGI Operating Plan Amendment  
**Attachments:** NY4Cool -- December 2025 sign-on letter to Three Agencies.pdf

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Dear NYSERDA,

New Yorkers for Cool Refrigerant Management appreciates the opportunity to submit comments in response to the 2026 Draft RGGI Operating Plan Amendment.

In December 2025 our organization sent letters to NYSERDA President and CEO Doreen Harris, Public Service Commission Chair and CEO Rory Christian, and DEC Commissioner Amanda Lefton requesting that they implement one of the recommended actions identified for their agencies by the Scoping Plan, namely “coordinate to develop incentives such as utility rebates and grant programs to support the adoption of natural refrigerants in food stores.” (See Chapter 12, pp. 217 of the Scoping Plan.) A copy of the letter is attached.

This is an ideal way for NYSERDA to use RGGI funds, because there are two layers of benefits.

First, when food stores switch from refrigerants with high global warming potentials to natural refrigerants with ultra-low global warming potentials, huge amounts of emissions are avoided at a relatively low cost. This is not an energy based reduction in greenhouse gases, but because refrigerants are such potent greenhouse gases – hundreds to thousands of times more powerful than carbon dioxide – they should be proactively managed.

Second, when the natural refrigerant systems are designed appropriately, they can use reduced amounts of electricity, a positive contribution to grid efficiency and affordability for all ratepayers.

To implement this action, we urge that NYSERDA undertake an engineering study to provide the necessary data for the Department of Public Service [Technical Resource Manual](#) to enable utilities to calculate appropriate rebates for food stores that adopt natural refrigerants.

Another action NYSERDA could take, based on the research mentioned above, is to expand its Buildings Technical Assistance Programs to also include providing advice to food establishments that would help them gain maximum energy efficiency while adopting natural refrigerants. Beyond that, the research required for this project could also help NYSERDA evaluate if there are other sources of funds that could be used for “grant programs” (as mentioned in the Scoping Plan) purely for the greenhouse gas reductions we all benefit from when food establishments convert to natural refrigerants.

If this request is implemented, the food stores themselves would then benefit from lower electricity bills, reduced refrigerant expenses in this era of high priced synthetic refrigerants, and freedom from the AIM Act and Part 494 regulations governing high GWP refrigerants, which collectively would translate into better

affordability for their customers. NYSERDA's efforts could reduce emissions of refrigerants while contributing to better energy efficiency, the kind of public service we most need at this time.

Thank you for your consideration of these comments.

Respectfully submitted,

Michael Helme

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***on behalf of New Yorkers for Cool Refrigerant Management***



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