

Dear RGGI

These comments are on behalf of People of Albany United for Safe Energy, the affiliate of 350.org in the New York Capital Region.

## **PAUSE supports increasing RGGI funding for EmPower+ to maximum feasible level, to reduce planet-heating emissions and save money for New Yorkers.**

PAUSE fully supports the new funding levels proposed for the EmPower+ program in the Draft 2026 RGGI Operating Plan Amendment and respectfully recommends that the NYSERDA Board of Directors approve those funding levels at the Board meeting on January 26, 2026.

The EmPower+ program helps low-to-moderate income (LMI) households to save energy and money toward energy improvements made to their primary residence. About half of New York households are LMI, already struggling to stay afloat, and most cannot afford the front end costs of efficiency upgrades that would save them money over time.

The EMPOWER+ program focuses on one-to-four family households. Through EmPower+, eligible New Yorkers can receive a no-cost home energy audit, a customized plan for electrification and energy efficiency measures and no cost direct install of improvements identified during the home energy audit. EmPower+ participants can receive funding toward the cost of the energy efficiency and electrification improvements, including air sealing, insulation, heat pumps, heat pump water heaters, and electrical service and wiring upgrades.

The draft 2026 RGGI Operating Plan amendment proposes a significant increase in funding for the EmPower+ program for the next three years with a new total of 240.9M. The plan estimates that 90% of EmPower+ allocations will directly benefit LMI and disadvantaged communities.

Investing RGGI auction proceeds in the EmPower+ program aligns with both the newly approved 2025 State Energy Plan and the Climate Action Council Scoping Plan which stress the importance of increasing State funding to provide incentives to LMI households to transition to clean heating and make their homes more energy efficient, healthy and affordable. Nearly half of New York households have LMI levels and are in desperate need of assistance to upgrade their homes to modern energy systems such as heat pumps and heat pump water heaters.

New York must continue to lead in public investments for a transition from fossil energy to a sustainable economy as the climate crisis becomes more and more destructive, and the Trump regime seems determined to make it worse.

The climate emergency continues to accelerate as fossil-fueled global overheating increases relentlessly. The the hottest ten years in human history have been the last ten years, and the direct and indirect costs are skyrocketing. The world is at serious risk of blowing through the unknown point of no return beyond which accelerating feedbacks could push the planet into a “Hothouse Earth” equilibrium with much of the Earth uninhabitable:

Trajectories of the Earth System in the Anthropocene - “Hothouse Earth” report published by National Academy of Sciences: <https://www.pnas.org/doi/10.1073/pnas.1810141115>

A Bloomberg report last year found that the economic cost of fossil-fueled extreme weather in the USA over a 12-month period last year including both direct costs of destroyed property and the indirect costs of skyrocketing property insurance, was some 1 TRILLION DOLLARS.

<https://www.bloomberg.com/professional/explore/the-climate-economy-2025-outlook/> cited by Kate Aronoff  
<https://www.newsday.com/real-estate/insurance-costs-long-island-f6uhgh0x>

That total may not include health costs of both extreme weather and air pollution from fossil combustion and record shattering wildfires, as well as costs of cumulative reduced productivity resulting from acute disease. Those costs will only increase as greenhouse gases accumulate in the atmosphere, but the increase can be slowed, stopped, and eventually reduced if we minimize GHG emissions and phase them out ASAP,

The economic costs of systems that waste energy continue to squeeze millions of already struggling working families, especially lower income people and disadvantaged communities least responsible for emissions.

The economic savings for New Yorkers from reducing the use of fossil fuels, almost all from out of state, would more than pay for the cost of the investments over the life cycle of the improvements.

The NY State economy paid about \$50 Billion for fossil fuels, the lion's share from out of state, according to the US EIA <https://www.eia.gov/state/data.php/seds/seds/seds/search/search/?sid=NY>  
US Energy Information Administration data for 2023 (latest data year as of September 9 2025)  
NY State expenditures by fuel source (economy-wide, public and private):  
Petroleum \$ 37,730 million; Natural gas \$ 12,196 million; Coal \$ 20 million, **Total \$49.946 Billion.**

The building sector, especially heating and cooling, is the top source of greenhouse emissions in NYS, according to the 2022 NYS Climate Action Council Final report. <https://climate.ny.gov/resources/scoping-plan/>

Efficiency improvement is the most cost effective and fastest way to meet energy needs, as energy guru Amory Lovins, a winner of both the Right Livelihood award aka alternative nobel prize and the MacArthur "genius" award, has long argued, for example here:  
<https://www.forbes.com/sites/amorylovins/2019/01/21/the-invisible-energy-bonanza/>

So retrofitting buildings to improve energy efficiency, especially homes of lower income people, is about the best use of energy investment funds in many ways. Ideally, NY State should commit to retrofitting every building in the state to state of the art efficiency by 2030, and then use renewables - solar and heat pumps, especially on neighborhood scale - to meet the reduced need for energy to heat and cool the buildings.  
<https://www.nyserda.ny.gov/All-Programs/Clean-Energy-Communities/High-Impact-Actions/Toolkits/Thermal-Energy-Networks><https://www.technologyreview.com/2023/10/04/1080795/us-thermal-energy-networks/>

A promising way to retrofit large buildings could be to put the insulation as well as HVAC systems into a shell around the exterior of the building: <https://www.volts.wtf/p/a-new-way-to-retrofit-old-buildings>

The faster we retrofit New York buildings, the greater the savings, as long as the work is done right. The state must ensure with effective certification that the retrofits meet high quality standards (there is a history of fraud in home improvements). We strongly urge NY State to require that the work is done by well paid union workers, preferably hiring and training workers from disadvantaged communities and workers displaced from obsolete fossil-dependent jobs.