

January 9, 2026

NYSERDA

rggiprograms@nyserderda.ny.gov

RE: Comments on the Draft 2026 RGGI Operating Plan Amendment in Support of Increased Funding Levels for the EmPower+ Program

Dear NYSERDA,

Rewiring America appreciates the opportunity to submit comments in response to the 2026 Draft RGGI Operating Plan Amendment presented at the December 18, 2025 RGGI stakeholder meeting.

Rewiring America is a leading national home electrification nonprofit dedicated to accelerating the transition to clean energy in households and communities across the country. We develop accessible tools, data, and policy solutions that empower Americans to reduce emissions, improve health outcomes, lower energy bills, and build the clean energy workforce of the future. Rewiring America brings technical and policy expertise to regulatory proceedings focused on building electrification, grid flexibility, and affordability in New York and across the country. In New York, Rewiring America has prepared testimony in the Con Edison Electric Rate Plan (Case 25-E-0072), as well as submitted both individual and joint comments to the New Efficiency: New York proceeding (Case 14-M00094/18-M-0084) before the NYS Public Service Commission.

The 2026 Draft RGGI Operating Plan Amendment provides program descriptions and funding levels through March 2029. NYSEDA regulations provide for an annual convening of stakeholders representing a broad array of energy and environmental interests. This group of stakeholders advise NYSEDA regarding strategies to best utilize RGGI funds. The RGGI Operating Plan is reviewed and revised on an annual basis and NYSEDA holds an open meeting of the stakeholder group each year, inviting input on how to achieve greater scale of implementation, advance activities that realize benefits in disadvantaged communities (DACs), expand private investments and partnerships and address barriers to program success.

New York uses RGGI proceeds to promote and implement programs for electrification, energy efficiency and renewable energy development in compliance with the Climate Leadership and Community Protection Act (CLCPA). RGGI programs have and will continue to contribute to

economy-wide greenhouse gas emissions reductions and provide benefits to New York's historically overburdened and underserved communities. Proceeds derived from the RGGI CO₂ auction support the statewide goal of the Climate Act that 40%, and no less than 35%, of overall benefits from the investment RGGI proceeds will be spent in DACs.

The EmPower+ program helps low-to-moderate income (LMI) households to save energy and money toward energy improvements made to their primary residence. The 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. Rewiring America supports this laudable increase in funding for the EmPower+ program which is vital to achieving the State's GHG goals in DACs.

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.

So great is the need to provide EmPower+ incentives to LMI households that the NYS Public Service Commission recently expanded the eligibility criteria to ensure that households from across the state could take advantage of the program. Nearly 60 percent of LMI households live in one-to-four family homes, and over 40 percent of these households are renters. Reducing energy consumption through EmPower+'s electrification, energy efficiency and weatherization measures will bring down energy costs for these LMI households during times of high inflation.

Not only does the EmPower+ program help the participants of the program, it also is the backbone of the Clean Energy Sector where electrification and energy efficiency contractors make up 88% of clean energy companies. Residential building activity is a key driver of the building

electrification and energy efficiency industry and State incentives, such as EmPower+, are the most used incentives among building electrification and energy efficiency contractors.

It is important to note that many of the high-paying electrification contractor jobs created through State electrification incentive programs, like the EmPower+ program, are hired from DACs. Across the State, 60,000 clean energy jobs are held by residents of DACs, representing 33% of the Statewide clean energy workforce. For DACs, which generally experience high unemployment rates, this level of workforce participation underscores the importance of supporting the proposed funding levels for the EmPower+ program.

In conclusion, Rewiring America 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.

Thank you for your consideration.

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New York Policy Director

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