



January 8, 2026

NYSERDA

[rggiprograms@nyserda.ny.gov](mailto:rggiprograms@nyserda.ny.gov)

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

Dear NYSERDA,

On behalf of Sane Energy Project, we write in strong support of NYSERDA's December 18, 2025 proposal to amend the 2026 Regional Greenhouse Gas Initiative (RGGI) Operating Plan to significantly increase funding for the EmPower+ program over the next several years.

Sane Energy Project is a NYC-based community-driven organization working to decommission fracked gas infrastructure with democratically controlled, renewable energy in New York State. Our work is grounded in the lived experiences of communities most impacted by fossil fuel pollution, unsafe housing, and high energy burdens.

As part of this work, Sane Energy has participated as a formal party in numerous New York State Department of Public Service (DPS) proceedings addressing gas safety, utility rates, long-term gas system planning, energy efficiency, and implementation of the Climate Leadership and Community Protection Act. Through written submissions, testimony, and participation in technical conferences and stakeholder processes, we have helped build the administrative record demonstrating that demand reduction, building electrification, and non-pipeline alternatives are essential to meeting New York's climate, affordability, and public health goals.

That experience directly informs our strong support for expanding EmPower+.

In the communities we organize with, many of which are disproportionately burdened by gas infrastructure and rising utility costs, EmPower+ is one of the most effective programs for delivering immediate, tangible benefits. By providing free home energy assessments and

no-cost weatherization, electrification, heat pump, and electrical upgrades for one- to four-family homes and rental housing, the program lowers energy bills, improves health and safety, and creates real pathways away from fossil fuel dependence.

The proposed multi-year increase in EmPower+ funding appropriately reflects both the scale of unmet need across New York State and the program's critical role in reducing overall energy demand. As DPS proceedings have increasingly made clear, reducing demand through efficiency and electrification is essential to avoiding unnecessary gas infrastructure investments and protecting ratepayers. Strategic use of RGGI proceeds for EmPower+ directly advances this objective while ensuring that benefits flow to low- and moderate-income households and frontline communities.

Sane Energy has also supported implementation-focused learning around non-pipeline solutions, including helping convene a technical conference for DPS staff and utilities on utility thermal energy networks. These efforts reinforce the importance of pairing neighborhood-scale clean heating solutions with robust, household-level programs like EmPower+ so that communities can fully participate in—and benefit from—the clean energy transition.

We believe that achieving a renewable and democratic energy system requires a powerful grassroots movement of skilled, informed, and diverse people, alongside public institutions willing to invest in solutions that meet real community needs. Expanding EmPower+ through the 2026 RGGI Operating Plan is a concrete and effective way to align climate action with affordability, public health, and environmental justice.

We commend NYSERDA for proposing this increase and urge the agency to move forward with the amended 2026 RGGI Operating Plan.

Thank you for the opportunity to submit public comment.

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Sane Energy Project



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