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**From:** Allyson Samuell <allyson.samuell@sierraclub.org>  
**Sent:** Friday, January 9, 2026 6:25 PM  
**To:** erda.sm.rggiprograms  
**Subject:** Sierra Club Comments

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January 9, 2026

## VIA ELECTRONIC FILING

RE: New York's Regional Greenhouse Gas Initiative Operating Plan Amendment for 2026

To Whom it May Concern:

My name is Allyson Samuell, I write to express the Sierra Club's strong support for New York's Regional Greenhouse Gas Initiative (RGGI) Operating Plan Amendment for 2026.

We commend the great work from Department of Environmental Conservation (DEC) and the New York State Energy Research and Development Authority (NYSERDA) in implementing RGGI. This implementation has significantly reduced greenhouse gas emissions and directly benefits New Yorkers with cleaner air, lower energy bills, greater electric system reliability, and job creation. Under regulation, NYSERDA is responsible for funding programs for "energy efficiency, renewable or non-carbon emitting technologies, and innovative carbon emissions abatement technologies with significant carbon reduction potential...." The proposed Operating Plan Amendment for 2026 directly fulfills NYSERDA's regulatory responsibility, and we strongly support its adoption.

Specifically, we strongly support the proposal under the Large-Scale Generation Programs. Here, RGGI funding would be used to invest in large-scale electricity generation in New York State, particularly initiating a new Offshore Wind Predevelopment Support Program (Program). This Program would enable New York to co-invest in project-specific pre-development activities that best accelerate project timelines. This Program will give developers some level of certainty that their projects are supported by the State, allowing them to continue investing in project development, and would also give the State certainty that projects are committed to development in New York.

Ultimately, this cost-sharing mechanism will benefit ratepayers by reducing overall project costs, lowering eventual bid prices, sending positive signals to the offshore wind market, and ensuring projects are successfully built as efficiently as possible. This Program will ensure clean energy at affordable, stable prices for New Yorkers and bring much-needed reliable energy to downstate New York. This will allow the State to maintain the confidence of the global offshore wind market, attract significant investment, and meet the regulations to fund programs for "renewable or non-emitting technologies."

Further, the immense work New York has already committed to the offshore wind industry must be protected. We acknowledge the significant work New York has already done to build up the offshore wind industry from its infancy. From the Propel NY project and the Brooklyn Clean Energy Hub to the South Brooklyn Marine Terminal (SBMT), private-public investment has brought billions of dollars into the State and has positively impacted our communities. Economic development from the offshore wind industry already delivers significant benefits to our state, and the investments made should not be squandered. If these steps are not taken during this period of federal uncertainty, it will be much more difficult to begin industry development again in the future.

We greatly appreciate the opportunity to engage in public input during the RGGI review process and strongly support the aforementioned Offshore Wind Predevelopment Support Program.

Thank you,  
Allyson Samuel

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