
From: TJ Short <tjshort@greenerfacilities.net>
Sent: Tuesday, January 6, 2026 9:02 PM
To: erda.sm.rggiprograms
Subject: Public Comment on 2026 Draft RGGI Operating Plan Amendment – Mechanical Insulation Efficiency

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To whom it may concern,

I am writing to submit a public comment regarding the 2026 Draft RGGI Operating Plan Amendment.

I encourage NYSERDA to explicitly recognize mechanical insulation inspection, maintenance, and repair as an eligible and prioritized use of RGGI proceeds. Maintenance-based efficiency measures—particularly on steam, heating hot water, chilled water, and domestic hot water systems—represent some of the most cost-effective and immediately deployable greenhouse gas reduction opportunities available to New York State.

Across public facilities such as correctional institutions, hospitals, campuses, and other large state-owned buildings, degraded or missing insulation is a common and persistent source of energy waste. Addressing these deficiencies delivers near-term fuel savings, emissions reductions, and operational cost relief without requiring major capital upgrades, extended downtime, or complex electrification timelines.

Programs focused on systematic mechanical insulation maintenance also align strongly with the Climate Leadership and Community Protection Act by:

- Delivering measurable emissions reductions quickly
- Reducing energy costs in state facilities serving disadvantaged communities

- Improving system reliability, worker safety, and facility resilience
- Supporting scalable, workforce-driven implementation models

I recommend that the Operating Plan Amendment clearly include mechanical insulation maintenance and repair as an approved efficiency category and encourage pilot programs within state facilities, with a pathway for statewide replication based on verified performance results.

Thank you for the opportunity to comment and for your continued leadership in advancing cost-effective, practical climate solutions for New York State.

Respectfully,

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