

January 9, 2026

New York State Energy Research and Development Authority
rggiprograms@nyseda.ny.gov

Re: Comments on the Draft 2026 RGGI Operating Plan Amendment

Thank you for the opportunity to comment on the Draft 2026 RGGI Operating Plan Amendment presented at the December 18th, 2025, RGGI Stakeholder meeting. My name is Martha Sickles with Urbecon LCC, an energy services and urban planning firm. Over the past several years we focused on advancing building decarbonization through advocacy on the State, Federal and City legislative and budgetary processes and public education and engagement.

As Federal energy policies and funding retreat from supporting the goals of New York State's Climate Leadership and Community Protection and New York City's Climate Mobilization Act, funding resources like the RGGI proceeds become more essential. The RGGI funds are guided by "Regulations (21 NYCRR Part 507) that establish administrative procedures for the auction process and provides that proceeds from the sale of the allowances will fund projects and programs for energy efficiency, renewable, or non-carbon emitting technologies, and innovative carbon emissions abatement technologies with significant carbon reduction potential, and for reasonable administrative costs incurred by the Authority."¹ Diverse stakeholders are selected and convened by NYSERDA annually to develop strategies for RGGI fund utilization in keeping with State priorities.

I appreciate that this year's Operating Plan has a strong affordability focus, with 62% of proposed programmatic investments allocated to programs in the Affordability theme, one theme out of four. This focus on creating affordable, efficient, healthy, and comfortable homes with energy efficiency, building electrification and renewable energy measures contributes to meeting building decarbonization targets in the Climate Scoping Plan.² The programs funded under the other three themes: Energy Abundance, Diversity and Reliability, Energy Innovation and Economic Development, and Thriving Communities and Environments, support technological, advancements, workforce development and public education that are crucial to advancing programs that address energy affordability and transition to clean energy resources for all New Yorkers. My comments below focus on several of the funded programs.

The added investment to the Empower + program of \$240.9 million over the next three years fills a funding gap left by decreased State funding. Empower+ receives funding from the System Benefit Charges, the State Budget- most recently with \$50 million from the Sustainable Futures Fund and RGGI. Empower+ provides no-cost comprehensive building energy assessments and

¹New York's Regional Greenhouse Gas Initiative Operating Plan Amendment for 2026, NYSERDA pg. 1

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direct install measures by participating program contractors. The assessments provide recommended improvements including insulation, air sealing, heat pumps water heaters, heat pumps, and electrical system upgrades that will be incentivized by the program. These measures increase the health, safety, comfort, and energy affordability of homes while curtailing the production of greenhouse gas emissions in keeping with goals in the recently approved State Energy Plan.

According to the New York State Climate Action Scoping Plan, 48% of New Yorkers are within LMI income ranges served by Empower+, so continued and expanded funding is crucial to meeting the Governor's goals of one million electrified homes and one million electrification ready by 2030. The Public Service Commission recently expanded eligibility for this program up from 80% to 100% of AMI or SMI whichever is higher. These changes in income criteria should expand effective demand for this program especially in the downstate region.

The 2026 plan amendment includes continued funding of the Green Jobs-Green NY Fund providing access to energy assessments and low interest financing for residential energy efficiency, building electrification measures and installation of photovoltaics at a total level of \$174million for the next four years. This financing, combined with Clean Heat incentives, may provide a full funding package for non LMI homeowners electrifying their heating systems. Urbecon participated in a NYSERDA funded Clean Heat campaign in Brooklyn administered by NYC 2030 District that facilitated the installation of heat pumps in over 60 1-to-4-unit buildings, many funded by this combination of Clean Heat incentives and Green Jobs-Green NY financing.

Successful scaling up of these programs providing energy retrofits for 1-4 family homes in which 60% of New Yorkers live, supports the growing energy efficiency and building electrification industry. According to the 2025 New York Clean Energy Industry Report, this sector grew by 4% adding 5,400 jobs in 2024 with many of these well-paying jobs in firms serving the residential sector. Roughly 33% or 60,000 of the clean energy jobs are held by persons living in DACs in line with the Investment requirements of the CLCPA.

As RGGI funds are not restricted like the System Benefit Charge funds, allocations to the Affordable Multifamily Buildings Program allow for fuel neutral programming for delivered fuel buildings that do not pay into the System Benefit Charge. While the primary focus of funding is indicated to be the NYSERDA upstate Affordable Multifamily Buildings Program, we hope some of the funds are allocated to the downstate AMEEP program to address the needs of low-income oil fueled buildings, especially those required to comply with LL97 Article 321 Prescriptive compliance pathway. These buildings must upgrade their heating systems and most lack funds to do so without incentive support.

The expanded funding for heat pump rebates for new construction as part of the New Construction and Thermal Energy Networks Challenges Programs is especially important given the pause in the commencement of the All-Electric Buildings Act.

I support the funding for Buildings Technical Assistance Programs to promote the adoption of

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technologies and practices to reduce energy loads and decarbonize buildings. The new strategic framework guiding the Energy Efficiency/Building Electrification (EE/BE) 2026-2030 funding prioritizes building electrification and increasing building envelope efficiency and weatherization measures, some new to the market. Technical assistance and education, also supported under Consumer Education, Uptake and Experience, will add to the success of EE/BE programs these funds will support.

I appreciate the opportunity to submit the comments above in support of the funding levels in the Draft 2026 RGGI Operating Plan Amendment and respectfully request the NYSERDA Board of Directors approve the Plan Amendment at the January meeting. Thank you for your consideration.

Regards,

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