



New York City Environmental Justice Alliance

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On the ground – and at the table.

October 4, 2024

To:

New York State Energy Research and Development Authority

### **Comments on New York State RGGI 2024 Operating Plan Amendment**

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice.

NYC-EJA is pleased to find that New York State has received an additional revenue totaling \$146,817,909 since the December 2023 RGGI Auctions and that NYSERDA has committed to continue investing this additional revenue for a clean energy transition. At the same time, this additional revenue presents an opportunity to more equitably reflect the needs and priorities of Disadvantaged Communities (DACs), which are currently not reflected in the operating plan amendment.

The Climate Leadership and Community Protection Act requires that 35-40% of investments by state agencies must be in DACs. While the estimated DAC contribution for additional RGGI revenue is 35%, this number can be easily increased in proportion to the needs and priorities of DACs. It is disheartening to see that energy efficiency and electrification upgrades for schools and affordable housing in DACs only expect a \$36,000,000 increase in funding, even though 80% of such funding would be allocated to DACs. In contrast, electric vehicle/Charge NY will receive \$44,000,000 in additional funds despite only 25% of those funds going to DACs.

Additional 2024 RGGI revenue allows NYSERDA to comply more than minimally with the Climate Act's mandates for disadvantaged communities and more truly reflect the environmental justice leadership that New York State has aspired to. To this end, New York investments for additional RGGI revenues must contribute most of this amount to programs that directly serve and have a rapid, material impact on Disadvantaged Communities.