



October 2, 2024

The New York Power Authority (NYPA) respectfully submits these comments in support of NYSERDA's Revision of the Draft 2024 Regional Greenhouse Gas Initiative (RGGI) Operating Plan Amendment ("the Revision"). NYPA believes that investing revenues from RGGI towards energy efficiency, renewable energy, and carbon abatement strategies, pursuant to 21 NYCRR Part 507, is a vital component of New York State's achievements of its ambitious climate goals.

NYPA's work to increase the adoption of electric vehicles (EVs), for example through the Evolve NY program, aligns with the goals of ChargeNY, which is slated to receive an additional \$44 million in funding through the Revision. NYPA supports NYSERDA's efforts under the ChargeNY program. In particular, NYSERDA's EV rebates have been effective in increasing EV adoption by engaging vehicle manufacturers and dealerships in transitioning their customers to EVs. In addition, to promote the electrification of school buses, ChargeNY has assisted key decisionmakers at school districts, such as transportation directors and business managers, who have questions on the performance and economics of electric school buses as well as the complexities of installing and operating charging equipment. The education and outreach provided through ChargeNY has been an important source of information for these decisionmakers across the State.

On a related matter, NYPA has experienced widely varied timelines when seeking permits from municipalities for installing EV charging stations. These varied timelines, which can lead to permitting delays and project uncertainty, often stem from municipal decisionmakers who are unfamiliar with the subject of EV charging stations. Therefore, NYPA is supportive of NYSERDA's effort to invest in education and outreach to municipalities so that permitting can be achieved more expeditiously and with more assurance for communities.

NYPA also supports NYSERDA's indication of the percentage of funds that will be realized in Disadvantaged Communities (DACs). NYPA is wholly supportive of this effort and applauds NYSERDA's intentional allocation of these resources to align with the State's goal that at least 35% with a goal of 40% of the overall benefits from the investment of RGGI proceeds will be realized in DACs, pursuant to the Climate Leadership and Community Protection Act and NYSERDA's CO₂ Allowance Auction Program regulations.

Finally, NYPA supports NYSERDA's expansion of the Building Retrofit and New Construction Challenges. As proposed in the Revision, NYSERDA is allocating an additional \$30 million to fund competitive challenges that demonstrate exemplary design and high performance for zero-carbon new construction and existing buildings that are hard to decarbonize. Presently, NYPA leads New York's Decarbonization Leadership Program which leverages NYPA's energy services and engineering expertise to develop decarbonization action plans for 15 of the

highest-emitting state facilities.¹ NYPA supports NYSERDA's additional investment to create economically viable and replicable approaches for existing buildings that are hard to decarbonize. Such investments are an effective tool to capture and streamline these decarbonization opportunities and help New York meet the Climate Act objectives.

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¹ Pub. Bldgs. L. § 91(1).