



March 20, 2009

David Coup  
Manager, RGGI Programs  
NYS Energy Research and Development Authority  
17 Columbia Circle  
Albany, New York 12203

Dear Mr. Coup,

We commend the Advisory Group and NYSERDA staff on the "Operating Plan for Investments in New York under the CO2 Budget Trading Program and the CO2 Allowance Auction Program". Clearly, a tremendous amount of work went into your plan and much care was given to including programs that would further many goals across many sectors.

We would advocate that NYSERDA consider additional funding from the CO2 Allowance Auction for research, business solutions and education. Investment in these three areas is crucial to assure successful deployment of sustainable solutions and the invention and commercialization of next generation technologies. NYSERDA must partner with Colleges and Universities to solve the problem of Climate Change and assure that New York benefits from the green economy.

### **Research**

We applaud the Clean Energy Advanced Research Centers (CLEAR Centers) program in the Clean Technology Industrial Development section of the Operating Plan that would establish one or two university based centers devoted to carbon mitigation. We do not believe that one or two centers are sufficient to address the significant need posed by the problem of Climate Change, or the opportunity to leverage federal and private funding.

New York, which will receive the highest percentage of RGGI proceeds of any state, has a historic opportunity to use RGGI funds to leverage significant federal and private research and development dollars. Given the economy, other states and Colleges and Universities themselves will be limited in their ability to provide cost share dollars to attract federal or private funding. If RGGI funds are made available to New York's Colleges and Universities for the purpose of cost sharing federal or private research dollars, everyone benefits. Colleges and Universities and their students benefit directly through improved opportunity and jobs. New York State benefits through the creation of additional jobs, invention of new technologies, commercialization of new businesses and revitalization of New York's economy. The planet benefits through inventions that must occur if the problem of climate change is to be fundamentally addressed. Accordingly, we suggest that NYSERDA consider fully funding at least four CLEAR centers at New York based Colleges and Universities, with commitments to fund cost shares for federal or privately sponsored research.

### **Business Solutions**

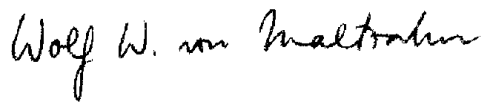
RGGI funds should be used to fund business and policy centers at New York Colleges and Universities. There are numerous and significant barriers to entry for the introduction and commercialization of new technologies. There is a complex web of laws, regulations, public opinion, transmission issues, and financing issues that make deployment of existing technologies challenging. Colleges and Universities can play an important role in developing and refining business strategies to address these issues and create solutions for the commercialization of new technologies and the deployment of existing technologies. Therefore, funds should be directed to establishing business and policy centers for clean technology at New York Colleges and Universities.

**Education**

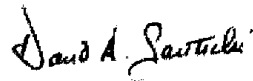
RGGI funds should be used to fund deployment of energy efficiency, renewable energy and carbon abatement technologies at New York Colleges and Universities. Colleges and Universities are educating the leaders of tomorrow. There will be a much greater reduction in GHG emissions if those leaders are educated about the use, optimization, and significance of the technologies the Operating Plan seeks to deploy, including technologies focused on energy efficiency, energy conservation, renewable energy and carbon abatement. Accordingly, funds should be directed to Colleges and Universities for demonstration projects that improve the efficiency of buildings and energy systems, deploy renewable energy systems, and measure and reduce their carbon footprint. Findings from such demonstration projects can then be incorporated into cross-campus curricular and research activities.

Thank you for the opportunity to comment on the Operating Plan for the Allocation of Proceeds from the New York Carbon Cap and Trade Program and. We respectfully submit these comments for your consideration. We look forward to working with you on this important set of issues and program in the months and years to come.

Sincerely,



Wolf W. von Maltzahn, Ph.D.  
Acting Vice President for Research



David A. Gautschi, Ph.D.  
Dean  
Lally School of Management and Technology