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VIA ELECTRONIC FILING

TO: New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-0001

RE: Mandatory Greenhouse Gas Reporting Rule Public Comment

The New York Battery and Energy Storage Technology Consortium (“NY-BEST”) is pleased to express our **support for the adoption of the proposed Mandatory Greenhouse Gas Reporting Rule.**

The publication of this rule marks a critical and commendable step toward identifying large climate polluters in New York State. We view this as a vital milestone in our shared fight for a cleaner, healthier, and more equitable future for all New Yorkers.

The proposed rule clearly outlines which entities must report greenhouse gas emissions and at what thresholds while ensuring comprehensive emissions data collection by including a broad range of contributors. This data is essential for holding the chain of carbon pollution accountable.

However, we emphasize that this action, while foundational, is not sufficient on its own. To deliver meaningful climate, health, and economic benefits for New Yorkers, DEC must promptly release full cap-and-invest regulations for public comment. These regulations are urgently needed to not only reduce emissions as mandated by the Climate Act, but also to raise vital funds for investing in, modernizing and cleaning up our energy and waste disposal systems.

New Yorkers across the state, from the clean energy industry to community organizers to public health advocates to climate leaders, are united in calling for a strong cap-and-invest program. Every day without comprehensive implementation allows major polluters to continue externalizing costs onto our communities. This delay slows clean energy investment and prolongs our exposure to polluted air, rising health care expenses, and continued environmental degradation.

A well-designed cap-and-invest program will reduce harmful pollution, generate billions of dollars to invest in clean energy solutions, and support thousands of good-paying jobs across New York. Furthermore, at least 33% percent of the program's revenue will be returned directly to families through electricity bill rebates, helping to ease energy burdens and promote affordability.

At a time when federal environmental protections are being gutted, New York must lead. The cap-and-invest program presents a unique opportunity to set a national example for effective, equitable climate policy that makes our people healthier and our communities stronger.

We respectfully urge Governor Hochul and the DEC to move swiftly by releasing the full set of cap-and-invest regulations for public comment and working quickly toward full program implementation.

We greatly appreciate your consideration. If you have any questions about these comments or need additional information, please contact us at 518-694-8474 or by email at info@ny-best.org.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William Acker".

Dr. William Acker
Executive Director, NY-BEST