



**MEMORANDUM OF OPPOSITION - ON PROPOSALS TO GUT THE CLCPA**

As the leading voice for the geothermal heating and cooling industry in New York State, we urge the legislature to reject the governor's recent April 28 proposal regarding CLCPA modifications/rollbacks. The New York Geothermal Energy Organization's staff, board and members are anxious to partner with generators, utilities and consumers by providing assistance in meeting the original CLCPA goals by "first reducing demand" through the large-scale installation of ground source heat pumps/geothermal systems. GHP's are the best existing, dispatchable, demand side reduction, emission free, renewable technology capable of achieving NY's building decarbonization goals with minimal grid impact. NY-GEO members do not oppose a realistic assessment of 2030 CLCPA timelines. What we oppose is the conversion of a scheduling challenge into a policy surrender. A timeline extension that preserves the original target and pairs it with explicit demand-side deployment mechanisms, including GHP incentives, is a credible path to CLCPA achievement. Target reduction is not a path to achievement. It is a path to continued fossil fuel dependency.

**We urge the legislature to rally around a counter-proposal that preserves the core tenets of the CLCPA.** The legislature must reject changes to the GHG accounting method without policies that directly reduce buildings-sector emissions, require timely regulations tied to mandatory interim targets, and include substantial funding until regulations are in place as well as meaningful protections for and investment in disadvantaged communities. Specifically, we urge the legislature to ensure that any budget deal with CLCPA rollbacks includes the following compensating policy and funding:

**1. Critical policies to lower building-sector emissions and utility bills:**

- Amend the utility obligation to serve gas and eliminate the 100 foot rule for commercial customers (Affordable Gas Transition Act – Part P Sections 5–7 of [FY25 Exec TED budget](#)).
- Require utilities to identify cost-avoidance opportunities via Pipeline Leaks and Safety Act ([S9075/A10071](#)).
- Include the Accelerate Solar for Affordable Power (ASAP) Act [S.6570A/A.8758A](#).

**2. Critical funding to improve homes' health, comfort, and affordability:**

- \$500 million in non-bonded annual funding to lower emissions and energy bills and to improve comfort and safety through building repairs, insulation, and upgrades with the Green Affordable Pre-electrification (GAP) Fund, the NYS HCR Weatherization Assistance Program (WAP), and Empower+ until the cap-and-invest revenue is realized.
- \$3 billion Sustainable Future Program with \$1 billion annual funding for building electrification.

Thank you for consideration of this letter's intent and comments. Please feel free to contact NY-GEO should you have any questions, comments or clarifications.

Respectfully

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