Conferral Report Prepared by the Power Authority of the State of New York Pursuant to Public Authorities Law § 1005(27-a)(d) for Conferral Year 2025

(Published December 9, 2025)

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I. INTRODUCTION

The 2023-24 Enacted State Budget amended the Public Authorities Law ("PAL") to require the New York Power Authority ("NYPA" or the "Power Authority"), beginning in 2025, and biennially thereafter, to develop and publish a Strategic Plan that identifies, among other things, NYPA's renewable energy generating priorities.[1] To help inform NYPA's development of each Strategic Plan, PAL § 1005(27-a)(d) instructs NYPA to confer annually with stakeholders to solicit their views on, among other things, how NYPA should implement its renewables authority to build new renewable generation resources, considering the State's progress on meeting the renewable energy goals of the Climate Leadership and Community Protection Act ("Climate Act" or "CLCPA")[2] and the status and timing of the interconnection process of the New York Independent System Operator, Inc. ("NYISO").[3] In November 2023, NYPA completed its first annual conferral process and published its first Conferral Report.[4] In October 2024, NYPA completed its second conferral process and published its second Conferral Report.[5]

Following the completion of its third conferral process, NYPA is making this 2025 Conferral Report available to the public in accordance with PAL § 1005(27-a)(d) which provides:

> *No later than one hundred eighty days after the effective date of this subdivision, and annually thereafter, the authority shall confer with the New York state energy research and development authority, the office of renewable energy siting, the department of public service, climate and resiliency experts, labor organizations, and environmental justice and community organizations concerning the state's progress on meeting the renewable energy goals established by the climate leadership and community protection act. When exercising the authority provided for in paragraph (a) of this subdivision, the information developed through such conferral shall be used to identify projects to help ensure that the state meets its goals under the climate leadership and community protection act. Any conferral provided for in this paragraph shall include consideration of the timing of projects in the interconnection queue of the federally designated electric bulk system operator for New York state, considering both capacity factors or planned projects and the interconnection queue's historical completion rate. A report on the information developed through such conferral shall be published and made accessible on the website of the authority.*

This Conferral Report satisfies the above-referenced requirement for 2025, provides background into the conferral process, summarizes the viewpoints of the conferees, and provides the Power Authority's observations and conclusions on the 2025 conferral process.

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[1] PAL § 1005(27-a)(e).
[2] Chapter 106 of the Laws of 2019.
[3] PAL § 1005(27-a)(d).
[4] Conferral Report Prepared by the Power Authority of the State of New York Pursuant to Public Authorities Law § 1005(27-a)(d) for Conferral Year 2023, available at: https://www.nypa.gov/-/media/nypa/documents/document-library/conferral-report/NYPA-Conferral-Report-Conferral-Year-2023-Final-Publication.
[5] Conferral Report Prepared by the Power Authority of the State of New York Pursuant to Public Authorities Law § 1005(27-a)(d) for Conferral Year 2024, available at: https://www.nypa.gov/-/media/nypa/documents/document-library/renewables/2024-conferral.

For the 2025 conferral process, NYPA gathered feedback from 41 stakeholder groups, including state agencies and authorities, regulatory entities, climate and resiliency experts, labor organizations and environmental justice and community organizations.[6] The 2025 conferral process and this 2025 Conferral Report have also informed NYPA's final Updated Strategic Plan, published on December 9, 2025. This 2025 Conferral Report represents a snapshot in time in an ever-changing energy policy landscape and will be updated annually.

II. BACKGROUND

Enacted in 2019, Climate Act established several goals intended to reduce greenhouse gas emissions and facilitate integration of new renewable resources and energy storage into New York's electric grid, notably:

- Generate 70% renewable energy by 2030 (the "70% Renewable Energy Goal");
- Install 6,000 megawatts ("MW") of solar capacity by 2025, later increased to 10,000 MW (or 10 gigawatts ("GW")) of solar capacity by 2030 (the "6 GW Distributed Solar Goal" and the "10 GW Distributed Solar Goal");
- Integrate 3,000 MW of energy storage capacity by 2030, later increased to 6,000 MW by 2030 (the "6 GW Energy Storage Goal"); and
- Build 9,000 MW of offshore wind by 2035 (the "9 GW Offshore Wind Goal").

Beyond setting renewable energy goals, the Climate Act also set a goal that, by 2040, the statewide electrical demand system will be zero emissions (the "100% Zero Emissions Goal").

To help inform NYPA's development of its biennial Strategic Plans, PAL § 1005(27-a)(d) instructs NYPA to confer annually with stakeholders to solicit their views on the State's progress on meeting the renewable energy goals of the Climate Act. PAL § 1005(27-a)(d) further directs that the conferral process consider the timing of projects in the interconnection queue administered by the NYISO, the capacity factors of such projects, and the historical completion rate of such projects in the NYISO interconnection queue. The statute directs NYPA to publish a report on the information developed through this conferral process on NYPA's website. NYPA completed the initial conferral process called for by the statute on or about November 1, 2023, and published the first Conferral Report on the NYPA website on November 30, 2023. NYPA conducted the 2024 conferral process in July, August, and September of 2024 and published the second Conferral Report on the NYPA website on October 8, 2024. NYPA conducted the 2025 conferral process in July, August, and September of 2025 and published this third Conferral Report on the NYPA website on December 9, 2025.

III. CLIMATE ACT PROGRESS

The CLCPA requires the PSC to issue a comprehensive review of the Clean Energy Standard ("CES") no later than July 1, 2024, and to do so every two years thereafter ("CES Biennial

[6] Please note that NYPA's formal annual conferral interviews generally take place between June and September of each calendar year, while written comments can be received at any time.

Review"). On July 1, 2024, the New York State Department of Public Service ("DPS") and the New York State Energy Research and Development Authority ("NYSERDA") filed a draft version of the inaugural CES Biennial Review for consideration by the PSC.[7] NYPA summarized Climate Act progress in its 2024 Conferral Report published on October 8, 2024, based on the draft CES Biennial Review and input from the DPS and NYSERDA[8]. On May 15, 2025, the PSC adopted Sections 1 through 5.2 of the draft CES Biennial Review, which set forth certain informational reporting requirements, as final, and adopted changes to the CES program.[9] NYPA's consideration of New York's Climate Act progress in this 2025 Conferral Report and in formulating its Updated Strategic Plan was informed by the final CES Biennial Review and ongoing updates to the State Climate Act Dashboard.[10]

The CES Biennial Review provides both retrospective and prospective views of the State's progress towards achieving the renewable energy goals of the CLCPA. The first four sections cover progress to date, addressing the policy and regulatory background of the CES and its antecedent program, the Renewable Portfolio Standard, operational renewable energy systems that have come online prior to January 1, 2023, contracted renewables, and factors affecting progress, including inflation, interest rates, transmission congestion, interconnection delays, capacity accreditation, federal incentives, siting reforms, and the potential for growth in Statewide electric load. The final two sections set forth a prospective view on various pathways to meeting the 70% Renewable Energy Goal and options to reform the CES program. In addition, DPS has recently published an in-depth report detailing CLCPA progress, costs to date, and program-specific emissions reductions estimates for the CES and more.[11] The current status of the Climate Act goals can be found on the State Climate Act Dashboard.[12]

IV. NYISO GENERATOR INTERCONNECTION

A. Introduction

In developing its Strategic Plan, NYPA considers "the timing, characteristics and size of the renewable energy generating projects in the interconnection queue of the federally designated electric bulk system operator for New York state."[13] In addition, the Strategic Plan will reflect information developed during the conferral process, which includes "consideration of the timing of projects in the interconnection queue of the federally designated electric bulk system operator for New York state, taking into account both capacity factors of planned projects and the

[7] Case 15-E-0302, Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard, Draft Clean Energy Standard Biennial Review (filed July 1, 2024).
[8] *See* https://www.nypa.gov/conferral-process.
[9] Case 15-E-0302, Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard, Order Adopting Clean Energy Standard Biennial Review as Final and Making Other Findings ("Biennial Review Order") (Issued May 15, 2025).
[10] *See* https://climate.ny.gov/dashboard.
[11] Case 22-M-0149, Proceeding on Motion of the Commission Assessing Implementation of and Compliance with the Requirements and Targets of the Climate Leadership and Community Protection Act, New York State Department of Public Service Second CLCPA Informational Report on Overall Implementation of the Climate Leadership and Community Protection Act (Issued September 18, 2025).
[12] *See* https://climate.ny.gov/dashboard.
[13] PAL § 1005(27-a)(e)(ii)(F).

interconnection queue's historical completion rate."[14]

In the 2023, 2024, and 2025 conferral processes, NYPA engaged with the New York Independent System Operator ("NYISO") regarding the generator interconnection process and discussed with the NYISO the timing of projects in the NYISO's interconnection queue, considering both capacity factors of planned projects and the interconnection queue's historical completion rate.

B. Background

The NYISO, operating under the oversight of the Federal Energy Regulatory Commission ("FERC"), administers interconnection of new generation to the electric grid to ensure that electric system resources (e.g., generation, storage) are supported by the infrastructure necessary to transmit the generated and stored electricity and support reliable operation of the State's electric grid. The process aims to enable new resources to interconnect to the power system safely and reliably, in compliance with necessary interconnection standards that are established by reliability standards organizations. Importantly, the process allows multiple resources to interconnect simultaneously at the least total cost, whereby each generator is apportioned its share of the cost to interconnect with the power system.[15]

The NYISO's interconnection processes are regulated by FERC and are set forth in tariffs that are approved by FERC.[16] Generators that seek to interconnect to the transmission system in New York State and to make wholesale sales of electricity must receive approval and execute an interconnection agreement signed by the NYISO and the connecting transmission owner. Generators sized up to and including 5 MW, and that do not involve federal-jurisdictional transmission or wholesale electricity sales, interconnect to the power system under PSC procedures, which are not subject to the NYISO's interconnection process. Generators over 5 MW that do not involve federal-jurisdictional transmission or wholesale electricity sales interconnect to the power system under the transmission owner's interconnection procedures.

C. Historical Completion Rate of the NYISO Interconnection Queue

The surge in proposed renewable resource and transmission projects together created a significant backlog in the interconnection of renewable generation projects to the New York transmission system. Between 2018 and 2024, the number of projects in the NYISO interconnection queue nearly quadrupled. To address the significant surge in proposed interconnections as part of the historic transition that is underway on the electric grid, the NYISO initiated a comprehensive interconnection queue reform initiative with its stakeholders in 2022.[17]

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[14] PAL § 1005(27-a)(e)(ii)(A) (citing to PAL § 1005(27-a)(d)).

[15] The NYISO's interconnection processes are regulated by FERC and are set forth in tariffs approved by FERC and posted on the NYISO's website: https://www.nyiso.com/regulatory-viewer.

[16] The interconnection provisions were previously housed in the NYISO's Open Access Transmission Tariff ("OATT") Attachments P, S, X and Z. In its Order No. 2023 compliance filing, the NYISO revised and relocated these provisions in a new OATT Attachment HH.

[17] *See* Improvements to Generator Interconnection Procs. & Agreements, Reply Comments of the New York Independent System Operator, Inc., Docket No. RM22-14-000 at 2 (Dec. 14, 2022).

D. FERC's 2023 Interconnection Reform Order and NYISO's Revised Cluster Study Process

On July 28, 2023, FERC issued a landmark order on reforming the generator interconnection process nationwide. The order included changes to weed out projects that are not viable and that otherwise delayed the interconnection process. Entitled "Improvements to Generator Interconnection Procedures and Agreements" ("Order No. 2023"), FERC described its reforms as primarily falling into three categories: (1) creating a first-ready, first-served cluster study process; (2) increasing the speed of the interconnection processes of transmission providers for new transmission and generation projects; and (3) incorporating advanced technologies, such as energy storage and transmission devices, into the interconnection process.[18]

On May 1, 2024, the NYISO submitted its Order No. 2023 compliance filing and asked FERC to make it effective the next day to begin implementation right away, in parallel with the completion of its final Class Year Study for 2023 under its prior procedures.

In its revised tariffs and procedures, the NYISO established a Cluster Study process that groups projects for a preliminary physical infeasibility screen followed by a two-phased evaluation of the reliability impacts of the projects' interconnections. The first phase assesses the local impacts of proposed interconnections, while the second phase assesses the broader systemwide impacts. Based on the results of the first phase, developers will decide whether to enter the second phase. The Cluster Study ultimately identifies necessary upgrade facilities and allocates the costs of those facilities among participating generators.

The NYISO began implementing procedures to transition to its new interconnection process on May 2, 2024. Prior to filing its Order 2023 compliance filing, the NYISO filed a partial compliance filing/waiver on November 3, 2023 to establish interim transition rules to expedite the efficient transition to the new Cluster Study process. Following implementation of the new process in May 2025, generation projects were withdrawn from the NYISO's interconnection queue under transition rules with the option to join the new Transition Cluster Study Process.[19] NYISO commenced the Transition Cluster Study Process under its new Standard Interconnection Procedures on August 1, 2024.

As of November 2025, there are 180 active projects in NYISO's Transition Cluster Study. The Transition Cluster Study application window has been extended to allow additional time for customers to address deficient applications. The next study phase – Phase 1 – involved transmission owner analyses of local upgrades. Phase 1 reports were delayed by 60 days. The process is now in Phase 2. Currently, and subject to change, the schedule for the Transition

[18] FERC Order No. 2023. FERC affirmed its interconnection reforms in Order No. 2023-A, including its stance on the treatment of network upgrades, allocation of upgrade costs, and the cluster study process, emphasizing a proportional impact method for network upgrades cost allocation, and denying requests to revise or eliminate feasibility studies from the interconnection process. FERC reaffirmed that it will impose penalties for late studies, including on ISOs/RTOs, after initial implementation, starting at $1,000 per study per day and increasing to $2,000 per study per day.

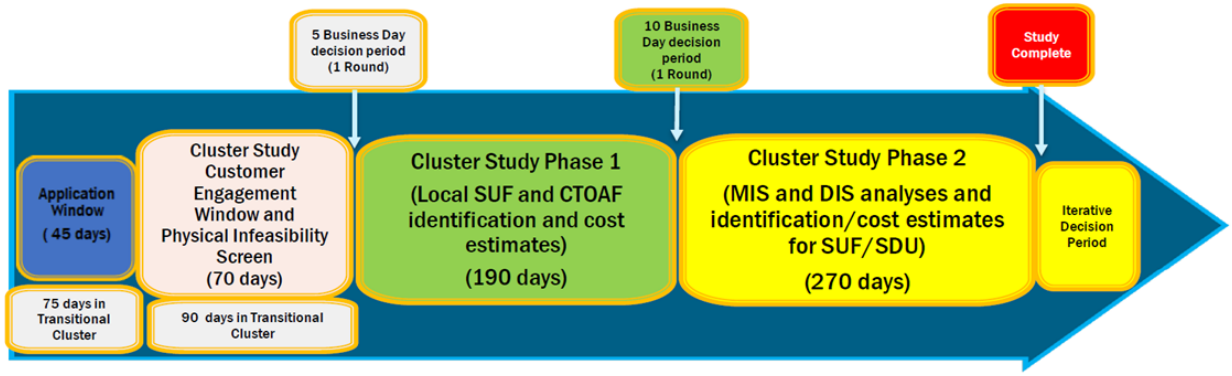
[19] NYISO Interconnection Queue, July 9, 2024, at line 284.

Cluster Study is as follows:

2024 Cluster Study Milestone	Date
Phase 1 Study Commenced	February 26, 2025
Phase 1 Study Completed	November 3, 2025
Phase 2 Decision Period	November 4–18, 2025
Phase 2 Study Commenced	November 19, 2025
Phase 2 Study Completed	August 17, 2026
Final Decision Period	August 18 – October 29, 2026

The NYISO expects the study process to be completed for all projects in the Transition Cluster Study by mid-August 2026, with potentially multiple iterative developer decision period rounds that would follow. The Application Window for the next Cluster Study is projected to start on August 3, 2026.

Following the Transition Cluster Study, the NYISO will follow the new Cluster Study process. According to the NYISO, the new interconnection process is expected to be faster, completing in 590 days or about 1.6 years, compared to the previous process that took between three and four years. The timeline below depicts the NYISO's new generation project interconnection Cluster Study Process:



Total Timeline: 590 days (1.6 years)
Total Timeline in Order No. 2023: 495 days to 585 days (1.4 - 1.6 years)

On April 17, 2025, FERC largely accepted the NYISO's Order No. 2023 Compliance filing, including the tariff changes to implement the current Transition Cluster Study.[20] FERC directed the NYISO to submit a supplemental compliance filing to address a few outstanding items. In May 2025, the NYISO and the New York Transmission Owners submitted a motion for rehearing on imposition of late study penalties and other issues. On June 16, 2025, the NYISO submitted its supplemental compliance filing to FERC. In an order issued on October 16, 2025, FERC largely accepted the NYISO's subsequent compliance proposals from the NYISO's June 16, 2025 filing with a single directive requiring further revisions.[21]

[20] N.Y. Indep. Sys. Operator, Inc., 191 FERC ¶ 61,049 (April 17, 2025).
[21] N.Y. Indep. Sys. Operator, Inc., 193 FERC ¶ 61,031 (October 16, 2025).

V. STAKEHOLDER CONFERRAL

A. NYPA's Approach to the 2025 Conferral Process

The 2025 conferral process expanded to reach more stakeholders than ever before, with NYPA inviting over 100 interested parties to contribute their unique viewpoints. In addition, NYPA published its draft of the Updated Strategic Plan and initiated the 2025 conferral process simultaneously on July 29, 2025, to allow conferees to consider the draft version of the Updated Strategic Plan while conferring with the Power Authority. This approach helped reduce stakeholder fatigue for this annual engagement process.

Each year the Power Authority will solicit views from interested parties to make sure its work to bring more renewables to New Yorkers is well-informed, effective, and transparent. As part of the 2025 conferral process, NYPA conducted conferral discussions with, or received written comments from, 41 stakeholder organizations from across the State. A list of stakeholders who participated in the conferral process is attached as Appendix A.

All conferees were invited to submit comments via virtual interviews; however, not all organizations scheduled interviews. Conferees were also given the opportunity to submit written statements or other materials as part of the conferral process.

The key themes in the interviews and written submissions are reflected in the summary below. Copies of written submissions are available on NYPA's website at the following link https://www.nypa.gov/conferral-process. NYPA considered all written and oral comments in drawing the observations and conclusions in Section VI of this report.

Conferral process topics of discussion included, but were not limited to, the following areas of discussion, as time and interest permitted:

- Please share your thoughts on the State's progress toward CLCPA goals.
- Please share your thoughts on how NYPA can or should support CLCPA.
- Please share your thoughts on what NYPA is already doing to support CLCPA.

Conferees were also asked to comment on anything else they would like NYPA to consider.

B. Summary of Conferral Process Comments

This section of the Conferral Report summarizes the viewpoints of participating stakeholders. It is not intended to be an exhaustive enumeration of all comments submitted in this process, nor is this summary intended to reflect NYPA's view on any comments received. Although stakeholders provided information on a wide variety of topics, the summary of their viewpoints contained below focuses primarily on those items discussed or addressed that are germane to the conferral process topics.

Stakeholder feedback from the conferral process is set forth below, with the views of each participating stakeholder sorted into a relevant interest category, such as "Generator

Stakeholders" or "Labor Stakeholders." Where possible, similar stakeholder feedback from multiple entities was harmonized into thematic issues of discussion.

1. Community Organizations and Environmental Justice Advocates

NYPA conferred with numerous organizations representing local community interests as well as disadvantaged community and environmental justice interests ("Community and EJ Representatives"), including Bronx Council for Environmental Quality ("BCEQ"), Clean Air Coalition of Western NY ("CACWNY"), the Law Office of Gary Abraham, Network for a Sustainable Tomorrow ("NeST"), NYC Environmental Justice Alliance ("NYEJA"), PEAK Coalition ("PEAK"), Stop Energy Sprawl, and Sustainable Westchester.

The majority of the Community and EJ Representatives expressed their support for the CLCPA and would like to see the CLCPA goals achieved. Most of these stakeholders commented that New York is not on track to meet the CLCPA goals. Some Community and EJ Representatives attributed the lack of progress to the State's failure to provide adequate funding. Sustainable Westchester expressed that while New York may be behind on some goals, the State is making significant progress on other goals, such as those related to distributed solar and renewable energy. Other stakeholders believe that the State is too focused on electrification in lieu of other methods for managing pollution and emissions, like carbon sequestration. Many stakeholders noted that recent policy changes by the federal government are making it more difficult to make progress towards the CLCPA goals but emphasized that New York can still be a leader in this transition. Stop Energy Sprawl expressed their opposition to the CLCPA, arguing that it is ill-conceived and unrealistic.

Community and EJ Representatives were generally supportive of NYPA playing an active role in developing new renewable resources, and many expressed support for NYPA increasing its initial 3 GW portfolio of potential projects to 7 GW in the draft Updated Strategic Plan. Nonetheless, some Community and EJ Representatives urged NYPA to further expand its project opportunity portfolio to 15 GW, while Stop Energy Sprawl and the Law Office of Gary Abraham argued that NYPA should reduce its renewable energy development and focus on other sources like hydropower and nuclear power.

Some Community and EJ Representatives emphasized the importance of distributed energy systems over centralized systems like nuclear power plants, urging NYPA to focus on solar, wind, and geothermal resources. In contrast, Stop Energy Sprawl shared their belief that continued investment in wind and solar will lead to continued investments in fossil fuels, arguing that natural gas will still be needed to provide power at times when renewable energy systems are not generating. Sustainable Westchester expressed interest in partnering with NYPA to supply renewable energy to Community Choice Aggregators ("CCAs"), like its CCA Westchester Power. Regarding the siting of renewables, CACWNY advocated for siting projects on industrial brownfields. PEAK and NYEJA advocated for more siting and development of renewable generation downstate.

Many Community and EJ representatives advocated for upgrading transmission and interconnection infrastructure. Many Community and EJ representatives expressed

disappointment in the PSC's denial of NYPA's petition for a Priority Transmission Project between Delhi, New York and Astoria, New York, and the withdrawal of the New York City Public Policy Transmission Need to deliver offshore wind energy into New York City. Some suggested that failing to prepare the grid for offshore wind is counterintuitive; however, these stakeholders generally acknowledged challenges to offshore wind development from the federal government's recent change in applicable policies.

Community and EJ Representatives stated that energy affordability is a major concern. Most stakeholders expressed that they are encouraged by and support NYPA's work to provide low-cost power to New Yorkers, such as the creation of the Renewable Energy Access and Community Help ("REACH"). One stakeholder, NeST, shared their belief that the biggest driver of high rates is building unneeded infrastructure, including gas. Some stakeholders suggested that undertaking new nuclear projects would increase rates. Stop Energy Sprawl stated that focusing on wind and solar will lead to energy becoming less affordable in New York. BCEQ suggested that NYPA should create a special program to reduce utility costs for people in communities of need near NYPA facilities.

Community and EJ Representatives generally supported NYPA building more energy storage in New York. Some stakeholders noted that New York has been slow to advance the CLCPA energy storage goal, emphasizing the need for storage when energy demand is high and its role in decommissioning small natural gas power plants. Sustainable Westchester noted that recent changes to the federal tax code have put significant restrictions on the ability to develop solar and wind but have left an opportunity to develop energy storage that should be pursued.

Most Community and EJ Representatives shared their support for NYPA's plan to decommission the small natural gas power plants and transition those plants to battery storage as a necessary step in meeting the CLCPA goals and reducing air emissions. Some noted that these NYPA-run plants are more efficient than similar plants operated by the private sector. BCEQ shared their support for decommissioning the small plants but expressed concerns with battery storage. PEAK and NYEJA expressed concern with the uncertainty regarding possible air quality impacts associated with retiring the small natural gas power plants. They also noted that concerns about battery storage may impact the decommissioning effort, stating that such concerns are largely due to misinformation that NYPA should work to address.

BCEQ focused their comments on the power plant at Harlem River Yards. They emphasized that this plant is in a community that is trying to reconnect with its waterfront. BCEQ suggested that NYPA create a community plan to repurpose the Harlem River Yards plant, making the site accessible to the community and part of a unified waterfront plan. They suggested using green infrastructure to help with stormwater, flooding, and air quality issues and possibly lowering temperatures. They suggested that the areas around this plant could be used for carbon sequestration and "recarbonization" sites, which would consist essentially of ecosystem restoration. BCEQ believes that if NYPA carried out this kind of plan, it could be a model for other entities. They stated that more transparency was needed surrounding NYPA's plans for Harlem River Yards. They also suggested that NYPA should create jobs at the current small natural gas power plants for community members.

Some stakeholders shared their opposition to NYPA building a new nuclear power plant in New York, citing the expense and time it will take to build. NeST focused on this issue, emphasizing that the problem of storing nuclear waste has not been solved and that newer technologies like small modular reactors are not proven. In contrast, Stop Energy Sprawl shared their strong support of NYPA developing a new nuclear power plant, emphasizing that a nuclear power plant would provide well-paying jobs, use only a small footprint, and have a greater capacity factor and a significantly longer lifespan than renewable generation projects.

Several stakeholders voiced support for NYPA serving in a leadership role in the energy sector, citing NYPA's track record of energy development, unionized workforce, pilot projects, innovative solutions, energy efficiency work, and demand response efforts. CACWNY urged NYPA to be bolder and more vocal about its positive contributions that further environmental justice and public benefits, especially in light of climate impacts affecting their region, Western New York.

2. Consumer Interests

NYPA conferred with two Consumer Interest Stakeholders: Partnership for Economic Prosperity ("PEP") and the Buffalo Niagara Partnership ("BNP").

Both Consumer Interest Stakeholders expressed that the State is not on track to meet all the CLCPA goals within their original statutory timeframes. BNP attributed this to several factors, including inflation, rising cost of capital, transmission constraints, changing federal incentives, siting issues, community feedback, and load growth from electrification of buildings, vehicles, and new businesses.

These Consumer Interest Stakeholders were supportive of NYPA helping to achieve the CLCPA goals, within reason. PEP expressed that the State needs to consider a more realistic trajectory to achieve those goals. BNP stated that New York needs to address the conflict between meeting the renewable generation goals and supplying the amount of energy that New York needs.

BNP emphasized that New York is pursuing the CLCPA goals to provide a model for other states and countries, positing that New York cannot make a significant change in global carbon emissions on its own. BNP emphasized that if the State sets ambitious goals that cannot be met and lead to high costs and insufficient power, other states will not follow New York's model. BNP shared their belief that the State needs to pursue ambitious goals in a sustainable and feasible way that can serve as a successful model.

Both stakeholders expressed support for NYPA pursuing renewable energy development in a prudent and realistic manner. PEP highlighted NYPA's deliberate choice of projects and the steps NYPA has taken to reduce risk and protect the renewable investments and projects it undertakes. This includes thoughtful consideration of project costs and revenues, feasibility, development timelines, supply chain constraints, potential external funding sources, and risk-reducing structures and strategies. BNP expressed that NYPA should consult with local firms and experts when sourcing and constructing new renewable energy systems.

PEP urged the State to be cautious in the new roles and requirements it imposes on NYPA in pursuit of the CLCPA goals, expressing concern that NYPA's resources may be spread too thin. They expressed their support of NYPA pursuing the CLCPA goals so long as existing hydropower and economic development programs are protected.

The Consumer Interest Stakeholders urged the State and NYPA to consider affordability and reliability while pursuing the CLCPA goals. Both stakeholders were particularly concerned with keeping electricity rates affordable. PEP emphasized the significant costs required to meet the CLCPA goals and the effect that has on the ratepayers and the cost of hydropower. PEP also shared their concern that because NYPA's development of renewables requires substantial borrowing and capital investment, NYPA's financial metrics and credit ratings may be impacted. They noted that this could increase NYPA's overall costs and shared their concern that it could hinder the Power Authority from undertaking needed projects at its hydroelectric plants and transmission lines to maintain sustainable and reliable energy generation and distribution to New Yorkers.

PEP shared that Western New York hydropower customers want NYPA to silo the costs of renewables so that they do not affect the cost of hydropower. To this end, PEP expressed support for NYPA's creation of the New York Renewable Energy Holdings Corporation to derisk projects and insulate economic development customers from increased costs associated with developing renewable generation.

The Consumer Interest Stakeholders stated that NYPA's essential role is providing affordable and reliable hydropower which ultimately drives economic development and protects New York jobs. PEP rejected the suggestion from other stakeholders that NYPA should redirect economic development funding from large corporations toward renewable energy development. PEP urged NYPA to remain committed to its longstanding core mission of economic development.

BNP expressed its support for NYPA building a new nuclear power plant, stating that nuclear is the only way to provide New York with the power it needs with zero emissions. BNP shared some concerns regarding proper disposal of nuclear waste and stated that it does not want to see a power plant built near a major population center. BNP emphasized that this is another way that NYPA and New York could serve as a model for other states.

3. Environmental and Energy Policy Advocates

NYPA conferred with a number of organizations that advocate for environmental and/or energy concerns, including Green Education and Legal Fund, New York Energy and Climate Advocates ("NYECA"), New York Energy Alliance, the New York League of Conservation Voters ("NYLCV"), Public Power New York ("PPNY"), and the Sierra Club Environmental Law Program ("Sierra Club") (collectively, "E&E Policy Advocates").

The E&E Policy Advocates generally voiced support for New York's efforts to meet the CLCPA goals, but most expressed disappointment with the pace of New York's progress. While many stakeholders noted the difficulties renewable energy development is facing in light of recent federal policy changes (most notably offshore wind), most E&E Policy Advocates still

emphasized the importance of meeting the CLCPA goals with accelerating economic development and rising demand for electricity in New York. However, some E&E Policy Advocates stated that the CLCPA goals were too ambitious and could not have been met in the timeframe originally envisioned due to significant technical and logistical issues.

NYECA and New York Energy Alliance shared their concerns about New York building out renewables at the scale and the speed required to meet CLCPA goals. NYECA's concerns included reliability, affordability, environmental and ecological impacts, and the possibility that building out a system that is overly dependent on intermittent sources will lead to the continued use of fossil fuels to satisfy demand when intermittent sources are not available and battery storage has been depleted. New York Energy Alliance expressed concern with NYPA building renewables all together, arguing that NYPA should focus instead on nuclear energy development. Other E&E Stakeholders argued that the State should do more to advance geothermal technology and increase its goals for distributed generation.

Most E&E Policy Advocates were encouraged by and support NYPA increasing its renewable energy and storage portfolio to 7 GW in the draft Updated Strategic Plan. Some advocates, including PPNY, urged NYPA to increase its portfolio to 15 GW to be built by 2030. In contrast, NYECA suggested that NYPA building 15 GW of renewables is not logistically possible, ignores necessary infrastructure improvements such as transmission and storage, and would result in curtailment.

Going forward, many E&E Policy Advocates urged NYPA to continue to look for opportunities associated with renewable energy and storage projects that are at risk, arguing that NYPA is uniquely suited to raise capital and help projects that would not be economically viable otherwise. Some E&E Policy Advocates, including PPNY, strongly encouraged NYPA to accelerate development of all its proposed and future renewable projects in order to benefit from available federal incentives and tax credits while they are still available.

As for siting renewable energy and storage projects, several E&E Policy Advocates encouraged NYPA to develop more renewable projects downstate where the load is greater. Some stakeholders, including PPNY, encouraged NYPA to do so by pursuing public partnerships with public universities, municipalities, and transportation organizations downstate to utilize their real property for renewable generation development. The Sierra Club specifically shared support for further development of solar projects on Long Island, citing a Long Island Solar Roadmap developed by the Nature Conservancy and Defenders of Wildlife which identifies optimal sites for mid- to large-scale renewable projects that could total 19.5 GW. Other E&E Policy Advocates urged NYPA to utilize brownfields or already developed areas when possible for new renewable projects and to work with the surrounding communities to build public trust.

Most E&E Policy Advocates expressed support for NYPA's plan to retire and transition its small natural gas power plants into battery storage facilities, especially those plants that are in communities already overburdened by polluting sources. Some stakeholders urged NYPA to see that transition through to completion, while others noted their concern that retiring small natural gas power plants too early could lead to that generation being replaced by less clean plants in the private sector.

All E&E Policy Advocates shared their appreciation for NYPA's expertise and consistency in building, operating, and maintaining critical transmission infrastructure that ensures grid efficiency and reliability. Many stakeholders emphasized how important a robust transmission system is to carrying renewable power across the state and ultimately meeting CLCPA goals. Many E&E Policy Advocates expressed their disappointment that the PSC did not advance NYPA's proposed Priority Transmission Project between Delhi, New York and Astoria, New York and withdrew the New York City Public Policy Transmission Need to deliver offshore wind energy into New York City, particularly in light of New York City's current energy needs and the time it takes to construct transmission lines. Many stakeholders expressed their hopes that these projects will be revisited in the future, pledging to help their advancement.

Some E&E Policy Advocates highlighted the important role that NYPA plays in providing the majority of New York's renewable energy in the form of reliable and affordable hydropower and suggested NYPA explore potential enhancements to existing facilities and responsible run-of-river projects to maximize NYPA's impact.

Some E&E Policy Advocates expressed opposition to nuclear power, highlighting the expense of construction, the issue of storing radioactive waste, and the carbon emissions related to construction, transportation, and mining. Other E&E Policy Advocates, including NYECA, expressed strong support for new nuclear generation as well as the Governor's decision to utilize NYPA's resources and expertise in this endeavor which would provide high-capacity, firm generation to support the grid.

4. Generator Stakeholders

NYPA invited several generator stakeholders to engage in the 2025 Conferral Process, with only the New York Battery and Energy Storage Technical consortium ("NY BEST") responding for an interview.

NY BEST expressed concern that New York is not on track to meet the CLCPA goals, stating that the State needs to redouble its efforts accordingly and welcomes NYPA's increased role in that effort. NY BEST shared its support of NYPA building as much renewable energy and storage as is prudent, including NYPA increasing its portfolio to 7 GW and considering at-risk projects. They emphasized that increasing the use of renewables creates significant health and cost-saving benefits. They also support NYPA's efforts to prequalify energy storage developers for potential collaboration and offered to help promote these opportunities in the future.

NY BEST emphasized that energy storage is a key enabling technology to help the transition to renewable energy and to reach a decarbonized, resilient grid. They noted that of the new storage projects in the Updated Strategic Plan, 70% are distributed retail energy storage.

NY BEST stated that there has been member feedback regarding the challenges of NYPA's statutory majority ownership requirement for renewable projects, stating that having a more flexible ownership structure could increase the likelihood of project success.

NY BEST expressed support for the REACH program, which enables energy storage projects to benefit low-income ratepayers in disadvantaged communities through bill credits. They also expressed support for NYPA's commitment to environmental justice and stakeholder engagement, noting that they have successfully collaborated with these teams and look forward to continuing that relationship in the future.

Finally, NY BEST voiced support for NYPA transitioning its small natural gas power plants to battery storage. NY BEST emphasized that while this transition may cause a short-term increase in emissions while the plants are being deconstructed, it would result in lower cumulative emissions in the long term.

5. Labor Stakeholders

NYPA conferred with several labor organizations, including the International Brotherhood of Electrical Workers ("IBEW") Utility Labor Council of New York State, the New York State AFL-CIO, the New York State Building & Construction Trades Council ("BCTC"), and the Utility Workers Union of America Local 1-2 ("UWUA") (collectively, "Labor Stakeholders").

Labor Stakeholders generally expressed that the State has demonstrated meaningful progress toward achieving the CLCPA's renewable energy goals and welcomed NYPA's contributions toward their advancement. IBEW suggested that NYPA shift its focus from direct ownership and operation of renewables to facilitating and enabling renewable development in the private sector through transmission upgrades and grid operations. Many stakeholders expressed support for NYPA's commitment to robust labor standards and urged NYPA to continue to use its public power model to uphold strong labor standards and to maintain and create union jobs as NYPA implements the CLCPA. Several stakeholders emphasized the importance of prevailing wage and apprenticeship programs.

IBEW commended NYPA for establishing the New York Renewable Energy Development Holdings Corporation to expand financing capacity while protecting NYPA's credit strength. IBEW also commended NYPA for the REACH program and its commitment to community solar gardens and environmental justice projects.

While many Labor Stakeholders expressed support for the development of renewables, some stakeholders believe that renewables are not being built quickly enough to begin shutting down other sources of generation like the small natural gas power plants. UWUA noted that New York City reached record-breaking reserve levels during peak load this past summer, emphasizing that NYPA needs a plan on how to meet those energy needs in the future, particularly in the winter when sources like Champlain Hudson Power Express and other renewables will be providing less energy to New York City. IBEW encouraged NYPA to work with the NYISO, PSC, and organized labor to conduct reliability studies before each fossil plant retirement to prevent adverse reliability or emissions impacts. NYS AFL-CIO and NYS BCTC encouraged NYPA to repurpose existing facilities and to incentivize private investment in new, zero-carbon emission technologies that strengthen local communities.

During this transition, Labor Stakeholders urged NYPA to prioritize protecting unionized

workers that have been operating the small natural gas power plants in difficult conditions for years. IBEW emphasized the possibility that in the future utility workers may lose benefits or need to take entry-level positions at a significant pay cut as a result of the small natural gas power plants being shut down. NYS AFL-CIO and NYS BCTC stated that this can be achieved by maximizing protections for current workers and ensuring that union employers can access reliable, affordable energy. UWUA suggested that these workers be given job opportunities in future battery storage facilities.

IBEW commended NYPA for dedicating $25 million annually to workforce training. They urged NYPA to maximize federal tax credits, loans, and state bonding authority to lower costs and reinvest the savings into workforce training and energy affordability. IBEW urged the State and the Department of Labor to develop a training program to bridge the gap between traditional utility operations and renewable energy systems and requested NYPA create a Utility Worker Just Transition Fund to retrain fossil fuel and legacy utility workers for clean energy roles.

Regarding transmission, IBEW highlighted that NYPA's completed transmission projects have unlocked renewable delivery capacity, reduced congestion, and lowered emissions. However, they noted that there is still work to be done regarding interconnection bottlenecks, permitting timelines, and a coordinated workforce transition strategy. IBEW urged NYPA to continue advancing its proposed transmission project between Delhi, New York and Astoria, New York to reduce renewable curtailments and interconnection backlogs.

6. Municipal Stakeholders

NYPA conferred with organizations representing the interests of municipal entities across the State, including the New York Conference of Mayors ("NYCOM"), the New York State Association of Counties ("NYSAC"), the New York Association of Towns ("NYSAT"), New York City, Ulster County Executive Jen Metzger, New York City Council Member Alexa Aviles, and Cattaraugus County Legislature Vice Chairman Ginger Schroeder (collectively, the "Municipal Stakeholders").

Municipal Stakeholders noted that the New York State has made considerable progress in renewable energy deployment, modernizing transmission infrastructure, and establishing innovative programs such as REACH to address energy affordability, but also highlighted several concerns. These concerns included grid reliability, transmission capacity, affordability and rising utility costs, and challenges that are unique to rural communities. New York City noted that while New York has seen rapid distributed solar growth in recent years, large scale renewable deployment has experienced challenges such as supply chain delays, a federal moratorium on offshore wind permits, and the rescission of federal incentives for renewable energy. New York City Council Member Alexa Aviles urged NYPA to expand the REACH program to include more projects to help better address the issue of energy affordability.

Many Municipal Stakeholders commended NYPA's addition of projects in the Updated Strategic Plan and encouraged NYPA to build as much renewable energy as possible. NYSAC, NYCOM, and NYAOT stated that NYPA should take a balanced approach to energy generation, including the use of natural gas and nuclear, while expanding renewable sources. New York City urged

NYPA to accelerate the development of renewables to support the State's progress towards the renewable energy goals of the CLCPA. Cattaraugus County Legislature Vice Chairman Ginger Schroeder urged NYPA to focus on nuclear, and less so on new renewables. New York City Council Member Alexa Aviles suggested that further increasing the total project capacity to 15 GW seems reasonable given projected load growth.

NYSAC, NYCOM, and NYAOT supported modernizing the transmission grid and the creation of an "energy czar" within NYPA to coordinate state efforts and energy planning with local economic development needs, support job creation, and serve future load growth. New York City also expressed disappointment with the PSC's denial of NYPA's petition for a Priority Transmission Project between Delhi, New York and Astoria, New York and the cancellation of the New York City Public Policy Transmission Need process.

Municipal Stakeholders also highlighted the importance of prioritizing the siting of renewable energy on non-agricultural lands, such as rooftops, parking lots, and brownfields, and when sited on agricultural lands, the necessity of utilizing a dual-use agrivoltaics approach. Ulster County Executive Jen Metzger noted two brownfield sites that may present solar development opportunities.

NYSAC, NYCOM, and NYAOT requested that NYPA establish a structured consultation process to allow local governments to influence project decisions and spending priorities for the recently enacted Sustainable Future Program, including a dedicated funding stream for local government-led renewable energy initiatives. In addition, NYSAC, NYCOM, and NYAOT argued that NYPA must establish a mandatory, standardized approach to PILOTs and Host Community Benefit agreements, rather than through a case-by-case assessment for each project. New York City opined that NYPA should increase its community engagement and information sharing efforts and offered to collaborate further with NYPA to this end.

New York City underscored the CLCPA requirement for at least 35% of the benefits of the act to be directed towards disadvantaged communities and suggested that NYPA should provide further detail on how the projects it advances benefit disadvantaged communities, suggesting a focus on pollution reduction, provision of bill credits, community infrastructure deployment, tracking metrics, and contracting requirements.

7. Universities

NYPA conferred with several stakeholders representing universities, including Cornell University Department of Ecology and Environmental Biology ("Cornell"), SUNY Stony Brook, University at Buffalo ("UB"), Sabin Center for Climate Change Law ("Sabin Center"), and Clarkson University (collectively the "University Stakeholders").

Most University Stakeholders noted that New York is not on track to meet the CLCPA goals. Some stakeholders expressed their disappointment in the State's progress, while others expressed that New York is working diligently to meet the CLCPA goals and embracing its leadership role considering difficulties from the federal government. Some University Stakeholders shared their belief that the most important CLCPA goal is to reduce greenhouse gas emissions by 40% by

2030 and expressed concern that New York is not focusing on this goal the same way it is focusing on the renewable energy goals.

Many University Stakeholders expressed support for NYPA increasing the renewable energy and storage opportunities in the draft Updated Strategic Plan to 7 GW. Other University Stakeholders believe that NYPA needs to increase this portfolio of opportunities further. Some stakeholders suggested NYPA should focus on land-based wind and longer-term seasonal storage such as thermal or mechanical storage to help meet energy needs in the winter when solar sources may be providing less energy. Other stakeholders suggested prioritizing distributed solar and storage projects through community-based systems. The Sabin Center reiterated their support of agrivoltaics, encouraging NYPA to be a leader in this technology to demonstrate that energy production and agriculture can coexist.

Some stakeholders expressed strong support for the REACH program and its focus on low-income members of disadvantaged communities. UB suggested that NYPA make this a flagship program and publish metrics showing the public benefits of the REACH program to demonstrate its effectiveness to communities.

Several University Stakeholders highlighted the constraints New York and NYPA face in their efforts to pursue CLCPA goals considering the current federal administration. On this topic, UB suggested that there should be a clear understanding of whether offshore wind projects will succeed before NYPA invests in them. The Sabin Center focused on the Treasury's recently issued guidance relating to renewable energy tax credits and urged NYPA to accelerate its projects while these tax credits are still available.

Several University Stakeholders expressed their support for NYPA establishing the New York Renewable Energy Holdings Corporation as a subsidiary, with one stakeholder emphasizing that it may help to ensure that developing renewables does not detract from NYPA's broader mission.

Some University Stakeholders shared their support of NYPA's plan to retire its small natural gas power plants, emphasizing the potential health impacts caused by fossil fuel emissions in the surrounding communities. Cornell urged NYPA to provide a detailed timeline for shutting down the small natural gas power plants. Other stakeholders noted the importance of low-emission fossil fuel plants remaining in operation in order to maintain grid reliability.

Several University Stakeholders commended NYPA's long history of providing clean and reliable hydropower to New York, providing the bulk of New York's clean energy generation. They also noted their support of NYPA's continued attention to transmission issues and its commitment to pursuing transmission upgrades, emphasizing how important this work is to avoid bottlenecks when connecting upstate resources to downstate regions in order to meet CLCPA goals. Several stakeholders commended NYPA's use of innovative technology to strengthen the grid, with one stakeholder specifically referencing the AGile Lab.

Several entities discussed their support of NYPA's $25 million annual investment in workforce development. SUNY Stony Brook applauded NYPA's efforts to incorporate next generation workforce initiatives with education and community engagement at all ages. Some stakeholders

stated that NYPA should invest more in training the workforce in new technologies to ensure that New York can support grid transition and maintain reliability in the future. On the topic of training initiatives and community engagement, several stakeholders specifically commended the work and programming of NYPA's environmental justice team.

Regarding nuclear power, some stakeholders shared their belief that nuclear is a distraction from meeting the CLCPA goals and are concerned that this new project will take intellectual and financial resources away from NYPA's efforts to build renewable generation. Other stakeholders expressed support for NYPA developing a nuclear power plant and highlighted future workforce development opportunities.

8. Workforce Development Stakeholders

NYPA conferred with several workforce development organizations, including Solar One, the Griffiss Institute, the Workforce Development Institute, and Climate Jobs NY ("Workforce Stakeholders").

Workforce Stakeholders stated that progress towards achieving the State climate goals has been inconsistent. They noted that recent federal restraints have further hindered renewable development, but that New York has remained a beacon of progress when compared to many other states. In the face of these federal restraints, Workforce Stakeholders suggested that NYPA should take a greater leadership role in the State and amplify its efforts to fast-track projects to construction before the July 4, 2026, tax credit cut-off date to reduce project cost by 30-40%.

Solar One urged NYPA to increase its project queue to 15 GW of capacity and expressed disappointment that NYPA, in their view, has paid little attention in the draft Updated Strategic Plan to set forth a strategy to rapidly accelerate development to maximize access to federal tax credits. At the same time, Solar One suggested that NYPA should create alternative financial plans for projects that cannot reasonably be accelerated in time to secure tax credits. Climate Jobs NY highlighted NYPA's unique role as a public developer with a public mission and its access to low-cost capital as important strengths.

Workforce Stakeholders urged NYPA to undertake more distributed solar projects, including a focus on public land and public school decarbonization. Climate Jobs NY called out opportunities related to New York City Local Law 99 which was expanded in October 2024 to require 100 MW of solar to be installed on NYC property by 2030, and 150 MW by 2035. Additionally, Workforce Stakeholders suggested that even more storage is needed and should be sited on municipal property and/or areas where it can strengthen grid reliability and avoid transmission upgrades.

Workforce Stakeholders underscored the State's focus on affordability, and demonstrated support for NYPA's REACH program, but urge that more projects be designated to support REACH. Climate Jobs NY stressed that affordability can also be addressed by creating new family-sustaining union jobs that provide benefits to support a family in uncertain economic times. Workforce Stakeholders supported NYPA's workforce development efforts to date and noted that investments in workforce development are investments in the future that will benefit

all New Yorkers. Workforce Stakeholders also applauded NYPA's Environmental Justice Program, noting its success and effectiveness.

VI. OBSERVATIONS AND CONCLUSIONS

1. Participating stakeholders from around the State provided NYPA with valuable insights and perspectives throughout the 2025 conferral process. NYPA met with and received comments from a broad spectrum of interests, including community and environmental justice organizations, State and local government entities, universities, environmental and energy policy organizations, consumer interests, labor organizations, and energy storage developers. NYPA has considered this information and additional stakeholder input in the finalization of the 2025 Updated Strategic Plan and implementation of other responsibilities assigned to NYPA. Many of the themes from the 2023 and 2024 Conferral Processes were revisited in 2025. While some themes remained consistent in their trajectory, other topics, views, and concerns have evolved. Accordingly, NYPA's observations and conclusions follow suit.

2. The conferral process again confirmed that there is tremendous stakeholder support for achieving the goals of the CLCPA, and strong stakeholder support for renewable energy to address the impacts of climate change through reducing and eliminating greenhouse gas emissions from the State electric system. While all stakeholders embraced these environmental benefits, NYPA observed continued concern about the timeframes in which the CLCPA goals may be achieved, and about the affordability of the clean energy transition. In addition, some stakeholders expressed concerns related to feasibility, interconnection delays, system reliability, and environmental and land use impacts of new renewable generation. In contrast, other stakeholders expressed optimism with progress to date and identified a multitude of opportunities related to climate action and leadership, disadvantaged community benefits, economic development, workforce development, energy storage, and agrivoltaics.

3. Stakeholders were largely supportive of NYPA's efforts to develop renewables, establish the REACH program, facilitate a just transition away from fossil fuel, and support workforce development. Many stakeholders embraced NYPA taking a larger role in renewable development and were hopeful that their relationship to such development would be focused on community benefits. Many stakeholders expressed support for NYPA building new renewables to advance progress towards both the 70% Renewable Energy Goal and the 100% Zero Emissions Goal. Stakeholders differed in their opinions and preferences pertaining to the magnitude and pace of such efforts.

4. A new common theme in the 2025 conferral process was the adverse impact of shifting federal policy with respect to renewable energy development. As NYPA noted in its draft Updated Strategic Plan, published on July 28, 2025, the federal tax code was amended on July 4, 2025, significantly truncating the timeframe in which wind and solar projects must either commence construction (by July 4, 2026) or be placed in service (by December 31, 2027) to qualify for direct pay tax credits. In addition, the budget reconciliation amendments put into place new restrictions on projects using components

containing materials produced by Foreign Entities of Concern, and subsequent Treasury guidance has further limited the ability of project owners to safe harbor projects. In addition, shifting federal policy has resulted in adverse renewable energy development conditions in the United States. For example, shifting federal policy has resulted in adverse development conditions for offshore wind in the United States, which is expected to slow the State's progress towards its 9 GW Offshore Wind Goal in the near-term. Many stakeholders urged NYPA to move as quickly as possible to secure tax credits for as many wind and solar projects as possible before the limited window of opportunity closes. NYPA is prioritizing projects that it can develop expeditiously to meet the new federal deadlines to receive the direct pay tax credit; however, certain external factors, such as interconnection timing, tariff uncertainty, equipment lead times, and permitting schedules may adversely impact this effort. Removal of these tax credits in the long term and strong federal headwinds against renewables development are deeply concerning regarding the future buildout of renewable generation by the Authority and indeed all developers.

5. A common theme of the 2025 conferral process was concern about the State's ability to achieve the energy system goals set forth in the CLCPA. In the 2023 and 2024 Conferral Reports, NYPA observed how contract attrition was being addressed by NYSERDA through expedited procurement efforts. After the issuance of the 2024 Conferral Report on October 8, 2024, NYSERDA announced 23 contracts resulting from its 2023 Tier 1 solicitation, for projects totaling more than 2.3 GW of nameplate capacity[22] and 26 contracts resulting from its 2024 Tier 1 solicitation, for projects totaling more than 2.5 GW of nameplate capacity.[23] On September 26, 2025, NYSERDA launched the 2025 Tier 1 solicitation, seeking additional renewable energy projects capable of providing approximately 5,600,000 Tier 1 RECs annually.[24] This steady and continued progress will strengthen the economics of many projects. Together with NYPA's emergence as a renewable energy developer in 2025 with the publication of its inaugural Strategic Plan, these programs will further advance the State's progress toward the 70% Renewable Energy Goal.

6. As was the case in the 2024 Conferral Report, NYPA acknowledges that achievement of the 70% Renewable Energy Goal may become more challenging as statewide electric load estimates have increased from 151,678 GWh as estimated in 2020, to 164,910 GWh as estimated in July of 2024. If this increased projected load materializes, it will require even more renewable energy to come online to meet the 70% Renewable Energy Goal. As a result, the CES Biennial Review sets forth various scenarios and pathways to reaching that goal, one of which illustrates a potential path to achieving the goal by 2033. To address this issue and other challenges related to the 70% Renewable Energy Goal, the PSC has adopted changes to the CES, including increasing the average annual Tier 1

[22] See RESRFP23-1 Landing Page, available at: https://www.nyserda.ny.gov/All-Programs/Large-Scale-Renewables/RES-Tier-One-Eligibility/Solicitations-for-Long-term-Contracts/2023-Solicitation-Resources.
[23] *See* RESRFP24-1 Landing Page, available at: https://www.nyserda.ny.gov/All-Programs/Large-Scale-Renewables/RES-Tier-One-Eligibility/Solicitations-for-Long-term-Contracts/2024-Solicitation-Resources.
[24] *See* RESRFP25-1 Landing Page, available at: https://www.nyserda.ny.gov/All-Programs/Large-Scale-Renewables/RES-Tier-One-Eligibility/Solicitations-for-Long-term-Contracts.

solicitation target and extending NYSERDA's Tier 1 procurement authority to 2029. With these changes and with recent Tier 1 procurement efforts mentioned above, significant progress has been made.

7. Most stakeholders seemed to agree that NYPA's downstate small natural gas power plants (referred to by some as NYPA's "peaker" plants) should be transitioned away from fossil fuel generation. On May 9, 2025, NYPA published its Small Natural Gas Power Plant Transition Plan.[25] As stated in its plan, NYPA is undertaking studies with the NYISO to determine whether deactivating the small natural gas power plants would cause more than a de minimis increase in emissions of greenhouse gases or criteria air pollutants in a disadvantaged community from emissions from other generators that would be required to run more. For those generators that can be deactivated without harming air quality, NYPA is required to work with the NYISO and local utilities to determine if those units are needed for emergency power or to maintain bulk power system or local power system reliability. In the meantime, NYPA has been pursuing opportunities to replace gas turbines on some of the sites with battery energy storage. To this end, the Power Authority has entered into non-binding term sheets and is pursuing development agreements with energy storage developers for four sites- Harlem River, Gowanus, Hellgate, and Pouch. NYPA also issued an RFI on development options for its Kent Avenue site and is evaluating the responses. Finally, NYPA is evaluating responses to an RFP to replace gas turbines with energy storage at its Brentwood, Long Island plant. For each plant that NYPA determines cannot be retired due to increasing air emissions from other older power plants or because the plant is needed to provide emergency power or electric system reliability, NYPA plans on revisiting the determination every two years until that plant can be retired. The Authority will continue to consult with local communities as it plans deactivation of the small natural gas power plants. On October 14, 2025, the NYISO issued its Short-Term Assessment of Reliability ("STAR") report, identifying reliability needs in New York City driven by increasing loads, transmission limitations, and the aging of the New York City generation fleet.

8. Many stakeholders expressed interest and enthusiasm about the labor-related provisions contained within NYPA's new expanded authority. These stakeholders urged NYPA to integrate requirements for prevailing wage, project labor agreements, labor peace agreements, and domestic content into its plans for renewable development. Many stakeholders, especially those representing organized labor, stressed the importance of clean energy workforce training and re-training of displaced workers and provided feedback on the critical components of programs, including consideration of wraparound services such as childcare and transportation. NYPA and the New York State Department of Labor have been actively engaged on these topics, jointly executing a Cooperative Agreement in March of 2024 to collaborate on programs related to workforce training, retraining, and apprenticeship opportunities in the renewable energy field. NYPA is taking clean energy workforce development very seriously. Since the start of the 2024 State fiscal year, the NYPA Trustees have approved over $37 million of expenditures for various workforce training initiatives under PAL § 1005 (27-d). Several stakeholders highlighted the work of NYPA's Workforce Development and

[25] *See* Small Natural Gas Power Plant Page, available at: https://www.nypa.gov/Small-Natural-Gas-Power-Plants.

Environmental Justice teams, providing education and training initiatives for individuals of all ages, helping to educate New Yorkers and encourage individuals to join a strong, educated workforce with family sustaining jobs that can support New York's transition away from fossil fuels.

9. In the 2024 Conferral Report, some stakeholders expressed concerns that NYPA's development of renewable energy would adversely affect the low-cost hydropower rates upon which many New York businesses rely. One of these stakeholders suggested that NYPA "silo" the risks associated with renewable development to insulate NYPA from potentially adverse financial impacts. Since that time, NYPA has incorporated a wholly-owned subsidiary, the New York Renewable Energy Development Holdings Corporation pursuant to PAL § 1005(27-a)(f) to allow NYPA to nimbly develop new renewable generation while isolating NYPA from certain liability associated with renewable resource development. Stakeholders who initially raised this concern in prior conferral processes were encouraged that NYPA had taken this approach.

10. Many stakeholders expressed concerns related to the affordability of achieving the renewable energy goals of the CLCPA. While NYPA works hard to ensure that it constructs and operates its assets as efficiently as possible, NYPA does not set retail electricity rates of the State's Investor-Owned Utilities. Several stakeholders recommended that NYPA work to consider ways to lessen the financial impact of electric utility service. NYPA agrees that affordability is a key element of the State's transition to clean and renewable energy and has created the REACH program to help provide relief to low-income New Yorkers in disadvantaged communities. In January 2024, NYPA filed a petition with the PSC to establish the REACH program to provide bill credits for low-income households in disadvantaged communities. In October 2024, after the publication of the 2024 Conferral Report, the PSC issued an Order approving NYPA's petition and establishing the REACH program. In response to the requirements of the REACH Order, the six major investor-owned electric utilities filed tariff modifications and program implementation plans with the PSC. In addition, the Power Authority signed agreements with each utility to transfer funds to implement REACH as revenues become available from new renewable generation resources and other sources. NYPA expects REACH bill credits to become available in January 2027. The bill credits will be funded from a portion of revenues from new renewable energy generation projects developed or contracted for by NYPA and designated for REACH, and other authorized contributions. On October 7, 2025, NYPA issued a Request for Application to provide a simple mechanism for renewable energy developers, battery storage developers, and other interested entities to make voluntary contributions to the REACH program.

11. In the 2024 Conferral Report numerous stakeholders suggested the State should focus on technologies other than wind and solar, such as nuclear energy, to achieve the 100% Zero Emissions Goal. Although nuclear energy is outside of the scope of NYPA's efforts under PAL § 1005 (27-a), many conferees advocated for NYPA to direct its resources towards new nuclear development. Other conferees expressed concerns about the expense of nuclear energy and unresolved issues related to the disposal of nuclear waste. In addition to its work on renewable energy development, NYPA's current mission has

recently expanded to include nuclear power. On June 23, 2025, Governor Hochul called on NYPA to develop and construct at least one zero-emission advanced nuclear power plant in Upstate New York to support a reliable and affordable electric grid, while providing the necessary zero-emission electricity to achieve a clean energy economy. NYPA is evaluating technologies, business models, and potential locations for this nuclear power plant. To this end, the Power Authority has issued requests for information to communities that wish to explore hosting nuclear generating projects and to developers who may be interested in partnering with NYPA on those projects.

12. In prior conferral processes, many stakeholders commented on the pace at which renewable energy projects move through the NYISO interconnection process. In the 2024 Conferral Report, we observed that the NYISO had filed amendments to its tariffs and procedures to implement FERC Order No. 2023, which replaced prior interconnection procedures with annual cluster studies designed to expedite the timeframes in which new generation will be able to interconnect to the New York grid. Since that time, the NYISO has initiated its Transition Cluster Study that implemented key components of the reformed process immediately. The Transition Cluster Study process is currently estimated to be completed in August 2026.

13. New York has achieved the 6 GW Distributed Solar Goal and is on track to meet and exceed the 10 GW Distributed Solar Goal, thanks in large part to the success of the NY-Sun and VDER programs, as well as significant contributions from LIPA and others. Some stakeholders have advocated for this goal to be expanded by the PSC, to as much as 20 GW of distributed solar by 2035.

14. Many stakeholders expressed concern about the continued reliability of New York's power system as it becomes increasingly reliant on intermittent resources, such as wind and solar. NYPA notes the State's continued progress on multiple fronts that will help New York maintain a reliable electric system as it progresses toward achieving the CLCPA goals. This progress includes movement toward achieving the energy storage goals of the CLCPA, such as the PSC's recently issued Storage Order, NYSERDA standing up newly invigorated retail and bulk storage programs, and the commissioning of NYPA's Northern New York Energy Storage Project, as well as the advancement of significant transmission upgrades, including NYPA's Smart Path Connect, Central East Energy Connect, and Propel NY projects.

15. Many Stakeholders highlighted the importance of prioritizing the siting of renewable energy on non-agricultural lands, such as rooftops, parking lots, and brownfields, and when sited on agricultural lands, the necessity of utilizing a dual-use agrivoltaics approach. They also emphasized the importance of working with communities when siting renewable energy projects to build and maintain public trust. Several stakeholders also suggested that more renewable energy and storage projects be sited downstate. In response to this stakeholder feedback, which was also conveyed in the 2024 conferral process, NYPA has included significant additional downstate resources in the Updated Strategic Plan. In addition, NYPA is spearheading a project with SUNY Cobleskill, EPRI, and NYSERDA to pilot new agrivoltaics interventions for New York that will serve to inform NYPA's agrivoltaics approach for years to come.

APPENDIX A

LIST OF CONFEREES

1. Bronx Council on Environmental Quality
2. Buffalo Niagara Partnership
3. Cattaraugus County Legislature Chair Ginger Schroeder
4. Clarkson University
5. Clean Air Coalition of Western New York
6. Climate Jobs New York
7. Cornell University Department of Ecology and Environmental Biology;
8. Green Education and Legal Fund
9. Griffiss Institute
10. International Brotherhood of Electrical Workers Utility Labor Council of New York State
11. Law Office of Gary Abraham
12. Network for a Sustainable Tomorrow
13. New York Association of Towns
14. New York City
15. New York City Council Member Alexa Aviles
16. New York City Environmental Justice Alliance
17. New York Conference of Mayors
18. New York Energy & Climate Advocates
19. New York Energy Alliance
20. New York Energy and Climate Advocates
21. New York League of Conservation Voters
22. New York State AFL-CIO
23. New York State Association of Counties
24. New York State Building & Construction Trades Council
25. NY Battery and Energy Storage Technology Consortium
26. Peak Coalition
27. Power for Economic Prosperity
28. Public Power New York
29. Sabin Center for Climate Change Law at Columbia University
30. Sierra Club
31. Solar One

32. Stop Energy Sprawl
33. SUNY Stony Brook
34. Sustainable Westchester
35. Ulster County Executive Jen Metzger
36. University at Buffalo
37. Utility Workers Union of America Local 1-2
38. Workforce Development Institute

STATE AGENCIES AND ENTITIES CONSULTED

1. New York Independent System Operator
2. New York State Public Service Commission
3. New York State Energy Research & Development Authority