

NYPA Renewables Updated Strategic Plan

Comment Portal Attachments

December 9, 2025





NYPA Renewables Updated Strategic Plan Comment Portal Attachments

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IN THE MATTER OF
NYPA'S RENEWABLES DRAFT UPDATED STRATEGIC PLAN

SEPTEMBER 11, 2025

There are approximately 1,500 MW of proposed new solar and 550 MW of storage in the North Country REDC included in the Plan. The two main clusters of development are in close proximity to two of the North Country's Disadvantaged Communities, the Saint Regis Mohawk Tribe and the City of Watertown. Based on the language around the proposed "Renewable Energy Zones (REZ)", one may infer that these areas with a concentration of proposed development will likely fall into that classification. Our concern is with NYPA's public input strategy for these areas, which may become Renewable Energy Zones, and where large proposed developments are clustered. To meet state goals and streamline the development of new renewables, outreach to communities must occur early and often, both during the public comment periods and after the plan's finalization. Better community engagement and education are needed to build trust between residents and the State.

The Renewable Energy Access and Community Help (REACH) Program is a promising initiative, assuming certain parameters are met at implementation. The REACH program must include low-income households that live outside of geographic DACs to ensure rural populations are not left behind. Additionally, for the REACH program to be impactful, more (if not all) proposed projects must contribute, and the benefits of this program should be felt as soon as possible.

Another proposal for "community gardens," where members of disadvantaged communities may potentially have an ownership stake, is a promising concept but leaves similar questions regarding access and participation. What criteria will determine which communities have ownership stakes? Financing can be challenging for these populations and must be addressed to enable a path to ownership. Additionally, will there be opportunities for low-income households and communities in non-designated DACs to participate? Language surrounding the benefits of REACH and other programs must provide clarity on the criteria for qualified low-income households within and outside geographic DACs.

NYPA's investment of up to \$25 million annually in workforce development programs is commendable. Continued and increased efforts to partner with trusted community organizations to encourage participation in workforce training programs will ensure long-term success and a robust, diverse clean energy workforce. Rural community members, training facility staff, contractors, and educators often lack the resources to be aware, let alone take advantage of these programs. These entities will need technical support to create a successful and unified approach to these workforce development initiatives.

*ANCA is an independent, nonprofit organization working to strengthen
key sectors of the economy in northern New York.*



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NYPA's focus on expedited renewable energy development in New York is needed to meet the goals of the Climate Act and to minimize the impacts of climate change. With an accelerated timeline, it is imperative not to leave Northern New Yorkers out of the conversation. Thorough and proactive public outreach and education, especially in Disadvantaged Communities and proposed Renewable Energy Zones, is key to keeping this plan on track.

Jill Henck
Adirondack North Country Association
Climate & Energy Program Director

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key sectors of the economy in northern New York.*



September 12, 2025

VIA ELECTRONIC FILING

<https://publiccomments.nypa.gov/>

New York Power Authority
123 Main Street
White Plains, NY 10601-3170

Re: NYPA's draft Strategic Plan for expanding renewable energy resources in New York State

The Alliance for Clean Energy New York (ACE NY) submits these comments on the New York Power Authority's ("NYPA") Updated Strategic Plan for developing new renewable energy generation projects in New York State. (NYPA published a draft of the Updated Strategic Plan on July 29, 2025, with a Sept. 12, 2025 deadline for public comments.)

Thank you for the opportunity to provide these comments and recommendations. If you have any questions or need additional information, please reach out to me.

Respectfully submitted,

Marguerite Wells

Executive Director
Alliance for Clean Energy New York
607-342-6805

I. INTRODUCTION

On July 29, 2025, the New York Power Authority (NYPA or Power Authority) published a draft of its Updated Strategic Plan, describing the Power Authority's efforts to develop, own, and operate renewable generation and energy storage projects with the objective to improve the reliability and resiliency of New York's grid. The draft plan includes 20 new renewable generation projects and 156 energy storage projects representing a combined capacity of more than 3.8 gigawatts (GW). Including the first tranche of projects identified in the inaugural strategic plan, NYPA's draft Updated Strategic Plan now highlights 64 potential clean energy projects representing nearly 7 GW of capacity—enough electricity to power nearly seven million homes.

As we have conveyed in our prior comments, ACE NY believes NYPA is in an ideal position to help fight climate change and help the state achieve its clean energy and greenhouse gas emission reduction goals. NYPA's actions can also help reduce pollution that is adversely impacting disadvantaged communities and communities of color. Moreover, NYPA's work in this area will provide resource adequacy and operational reliability, ensure resilience and energy security, and help to make the electric system less vulnerable to market shocks. NYPA's role is even more important today given the sweeping energy and environmental policy changes happening at the federal level.

The 2023-24 Enacted State Budget expanded NYPA's role in the renewable energy sector. The new authority allows NYPA to plan, design, develop, finance, construct, own, operate, maintain, and improve renewable energy generation projects to maintain an adequate and reliable supply of electric power and energy while supporting New York State's renewable energy goals established in the Climate Leadership and Community Protection Act (CLCPA). On January 28, 2025, NYPA published its inaugural NYPA Renewables Strategic Plan, which described for the first time how NYPA will operationalize its new renewables work, along with its continued and critical obligations to its existing generation, transmission, customer, and community commitments. NYPA's

draft Updated Strategic Plan provides additional projects and updates to existing projects, as well as updates to other elements of the inaugural NYPA Renewables Strategic Plan.

II. RENEWABLE ENERGY GENERATION, TRANSMISSION, AND STORAGE

We continue to be generally supportive of NYPA's approach to consider public-private partnership opportunities with private developers to develop projects at the lowest cost to ratepayers, and to build more renewable energy projects because of its participation. As NYPA's experience illustrates, there is considerable interest on the part of private developers and investors in collaborating with NYPA. Previously, we expressed concern that NYPA's foray into purchasing, constructing, and operating renewable energy projects, without competitive cost controls, could discourage private renewable development. This concern is still relevant if NYPA is competing for Renewable Energy Certificates (RECs) alongside private industry.

With respect to their Request for Information (RFI) and Request for Qualifications (RFQ), ACE NY appreciates NYPA's efforts to be transparent and maintain clear processes on their selection criteria for project selection and renewable energy developer partnerships. Moreover, we recognize that NYPA included in the Updated Strategic Plan a list of the criteria by which it evaluates potential partners and a list of what it looks for in a respondent's statement of qualification (pgs. 18 and 19 of the Updated Strategic Plan).

UPGRADING AND BUILDING TRANSMISSION

As we conveyed previously, NYPA can be effective at alleviating the significant transmission constraints that are hampering renewables deployment and when projects are built, are predicted to cause deliverability and curtailment problems. Thus far, NYPA has designated a few priority transmission projects since it was given the authority to do so by the New York State Legislature in 2021. The Smart Path and the Central East Energy Connect transmission projects are good examples of the key role NYPA should

take in developing renewables, and we urge NYPA to explore other ways it can build out the transmission system to better host renewable energy facilities, including the development of renewable energy interconnection hubs in strategic locations. We encourage NYPA: 1) to work collaboratively with private renewable project developers to identify where transmission projects can unlock New York State's renewable resource potential and 2) to communicate with the industry transmission project development initiatives so that developers can properly target their development efforts.

While the Clean Path NY project is not currently moving forward per the August 14, 2025 decision by the Public Service Commission (PSC), the project represented another example of a public/private collaboration that NYPA could participate in in the future. Also, NYPA has the authority – granted by the Legislature in 2018, to develop offshore transmission infrastructure to facilitate offshore wind power. NYPA and NY Transco are partnering with Consolidated Edison on the transmission project to bring the power from offshore wind projects to Long Island. *Again, we think that bold investment in new transmission facilities would be the best way that NYPA can leverage its expertise and creditworthiness and contribute to New York's achievement of climate goals.*

ENERGY STORAGE

Permitting for Stand-alone Grid-Scale Battery Energy Storage:

If the energy storage projects that NYPA seeks to develop are to make progress and reach commercial operation, then it will be critical for New York State to include stand-alone energy storage systems – 25 megawatts or greater – under the jurisdiction of the Office of Renewable Energy Siting and Electric Transmission (ORES or Office). Energy storage projects proposed in New York City would be exempt. ORES currently permits energy storage systems when they are paired with renewable energy generation. The Office has technical expertise and training to review storage design plans. ORES permitting also ensures consistent siting, operation, and safety standards are in place across the state. Taking this permitting approach would help increase the resilience of

communities across the state through the installation of safe and reliable energy storage technologies. It's also important to NY State's leadership role with respect to battery energy storage policy and safety standards.

Long Duration Energy Storage:

NYPA should more closely examine opportunities to deploy long-duration energy storage and multi-day energy storage, and should consider setting minimum targets for these resources due to their significant potential to lower the overall costs of achieving New York's CLCPA goals while improving electric reliability. NYPA's unique role in the transmission system gives it valuable knowledge about grid locations that face the most significant congestion and renewable energy curtailment. Long-duration energy storage is likely to have especially high value in these locations. NYPA should explore opportunities to deploy long-duration energy storage and multi-day energy storage to address transmission congestion and to increase the total amount of useful renewable energy available on the system. Lastly, we encourage NYPA to explore the deployment of long-duration energy storage and multi-day energy storage to support grid reliability during periods of extreme weather and as an alternative to existing fossil-fueled power plants in NYPA's portfolio. Recognizing that there aren't adequate price signals for long duration energy storage, NYPA is in a unique position to support investment in this critical resource that is essential to ensuring that New York State's electricity power supply is resilient.

Highlighting the Benefits of Energy Storage:

- *The integration of energy storage, a proven and widely used technology, is also fundamental for achieving a more efficient, flexible, and cost-effective electric grid for New York State.*
- *Increased reliance on energy storage reduces dependence on fossil fuels, increases availability of backup energy, and boosts economic outcomes in environmental justice communities, which have borne a disproportionate burden of polluting fossil fuels.*

- *Energy storage is uniquely suited to displacing peaker plants, which are disproportionately located Downstate and in Disadvantaged Communities. In New York City alone, replacing the City’s peaker plants with energy storage, wind and solar would result in estimated savings of \$1 billion in avoided environmental and health impacts and an additional \$1 billion in avoided energy system costs by 2035.¹*
- *Energy storage can stabilize electricity costs for consumers, generate economic investment for local communities, and create good-paying clean energy jobs for New Yorkers.*
- *Battery energy storage paired with transmission infrastructure will be cheaper and more efficient than building new transmission lines to integrate renewable energy, which will save ratepayers money.*
- *Energy storage plays a critical role in achieving the state’s climate goals and reaching zero-emissions sooner.*

UTILIZING NYPA PROPERTY

ACE NY restates its support for utilizing property/land owned by NYPA to expand renewable energy, especially if this land is not available to private developers.

III. RENEWABLE ENERGY AND FARMLAND

Given NYPA’s growing role in developing renewable energy, it should consider taking an active role in the NY State Agricultural Technical Working Group (A-TWG), in part to gain a better understanding of co-locating renewable energy with agriculture. The A-TWG serves as an advisory body to the State of New York and other participating entities, providing advice and guidance to help steer efforts to advance renewable (primarily solar) energy development across scales in a responsible way while appropriately balancing the needs and contributions of New York State’s agricultural operations, lands, and farmers.

¹ The PEAK Coalition. *The Fossil Fuel End Game 2.0: Tracking New York City’s Peaker Power Plant Closures and the Clean Energy Transition*. January 2024.

It is comprised of agricultural land and farmer advocates, solar developers and operators, non-governmental organizations that focus on clean energy, climate, and environmental protection, local government officials, academic experts, and state agencies. The A-TWG brings together science and socio-economic subject matter expertise to develop collaborative advice, guidelines, or other products that ensure protection of the State's agricultural land and farm economy while also advancing the State's renewable energy and greenhouse gas emissions reduction goals.

Solar energy can help to protect farmland by enabling new income streams for farmers, preserving and improving soil health and supporting long-term agricultural viability. It can also support beneficial practices like sheep grazing, reducing water needs through shade and providing energy for farm operations. ORES permitting requires projects to follow the Department of Agriculture and Markets solar guidelines, and preserve topsoil. An operating solar project at a minimum would preserve farmland for future generations, and accommodating agrivoltaics would only amplify the farm viability benefits.

IV. RETIRING PEAKER PLANTS

As conveyed in our previous comments, ACE NY supports NYPA retiring its fossil fuel peaker power plants and utilizing these sites for renewable energy generation, energy storage, or interconnection of other renewables. Ideally, the development of these NYPA sites should consider the lowest cost option for ratepayers. As NYPA has described, it has signed term sheets with a developer for BESS redevelopment projects at the sites, and this effort should be pursued in a timely manner. We encourage NYPA to set firm dates by which they intend on completing the work, such as modelling efforts, necessary to retire the peaker power plants. Additionally, we encourage NYPA to engage with the public on these efforts, to ensure decisions regarding these public assets are given the appropriate public input.

V. NEW NUCLEAR POWER GENERATION

Given the renewed interest in nuclear power, we urge NYPA and state government to maintain its pursuit of renewable energy. The state should focus its resources on lower cost carbon free generation that can currently be deployed at scale. Renewable energy projects are less expensive and faster to market than small nuclear reactors, many types of which are not yet commercially available. Renewable resources that are constructed and operating over the next few years will not only be carbon free but with additional generation on the grid, peaker plants can be retired. These are megawatts of clean power generation that are an annually compounded reduction in carbon emissions, compared to waiting for future carbon-free nuclear generation. We would like to convey for the record that ACE NY does not take a formal position on nuclear power, but we think NYPA should protect municipal customers' rates by investing in the lower cost option of renewable generation.

VI. CLEAN ENERGY WORKFORCE TRAINING & DEVELOPMENT

New York State needs trained professionals to achieve its clean energy goals. ACE NY commends NYPA's continued efforts with respect to developing clean energy jobs, retraining programs, and careers for unemployed or displaced workers, as well as those in underserved communities. As noted in the draft Updated Strategic Plan, NYPA's programs "serve as a pipeline to break down traditional barriers to entry for careers in the utility industry and to promote a more diverse candidate pool for the growing needs of the clean energy industry."

Illustrating these efforts are the following:

- NYPA is authorized to invest up to \$25 million annually in workforce training in collaboration with the New York State Department of Labor (DOL). These expenditures may be used to fund programs established or implemented by or within the DOL, including the Office of Just Energy Transition and programs for

workforce training and retraining, to prepare people around the state for employment in the renewable energy field.

- Pathways in Technology Early College High School (P-TECH) Scholars Program
- NYPA's Future Energy Leaders College Scholarship
- NYPA EV Workforce Program
- NYCHA Clean Energy Academy

VII. LABOR PROTECTIONS

ACE NY conveys our support for strong labor provisions and Project Labor Agreements (PLAs) that will apply to both contractors and subcontractors alike. These protections are critical to ensuring a robust workforce to build new clean energy infrastructure across the state.

VIII. OUTREACH & EDUCATION

In helping to advance the State's progress toward the renewable energy goals of the Climate Act, ACE NY believes NYPA can play a critical role in outreach and education related to the environmental, societal, and economic benefits of renewable energy and energy storage. These outreach and education efforts should be performed in collaboration with NYSERDA, the NYS Department of State, and other agencies. A key part of these efforts will be conveying to local municipalities and communities across the state the benefits associated with renewable energy and energy storage. Further engagement, outreach, education and support for local municipalities, communities and residents will improve acceptance of energy delivery projects.

IX. ENERGY EFFICIENCY & TRANSPORTATION ELECTRIFICATION

Given the electric sector and renewable energy's nexus with energy efficiency and transportation electrification, ACE NY offers comments on these key issue areas. NYPA can continue to play a critical role in advancing energy efficiency technologies and electrifying the transportation sector. As the transportation and building sectors in New York are responsible for the largest share of the state's total annual carbon emissions, NYPA should also maximize its efforts with respect to energy efficiency and transportation electrification to reach the CLCPA targets.

With respect to building electrification and efficiency, greater emphasis on building weatherization and heating electrification will reduce New York state's carbon footprint while reducing demand on the grid. Investments in upgrading transmission infrastructure can be reduced if NYPA helps, in the short term, to incentivize and encourage the implementation of household and municipal building weatherization and energy efficient devices to reduce energy consumption.

The continued dependence on gas-powered vehicles is detrimental to the state's efforts to tackle climate change and improve public health. NYPA should continue and expand the EVolve NY program to support public charging infrastructure across the State, even with the reduction in National Electric Vehicle Infrastructure (NEVI) program funding.

X. CONCLUSION

ACE NY appreciates the opportunity to provide feedback on the Updated Strategic Plan which describes the Power Authority's efforts to develop, own, and operate renewable generation and energy storage projects with the objective to improve the reliability and resiliency of New York's grid. NYPA can play a crucial and strategic role in helping the state achieve its clean energy and greenhouse gas emission reduction goals. NYPA's leadership and actions can also help reduce pollution that is adversely impacting

disadvantaged communities and communities of color. Moreover, NYPA's work in this area will provide resource adequacy and operational reliability, ensure resilience and energy security, and help to make the electric system less vulnerable to market shocks. NYPA's role, and New York State's leadership in general, is even more important today given the sweeping energy and environmental policy changes happening at the federal level.

Alliance for Nuclear-Free New York: Affordable Renewable Energy Now
Comments on the
New York Power Authority Renewable Energy Strategic Plan

The Alliance for Nuclear-Free New York is a coalition of over 20 groups working to protect our communities and environment from nuclear energy technologies. We appreciate the opportunity to comment on NYPA's Renewable Energy Strategic Plan.

As we face life-threatening heat waves, flash floods, skyrocketing energy bills, and an attack on climate action from the federal government, we need NYPA to help lead the nation on building public renewables that will slash pollution, make energy more affordable, and protect our planet now. In 2019, Governor Cuomo signed the Climate Leadership and Community Protection Act (CLCPA) into law and subsequently in 2023 the Build Public Renewable Act (BPRA) was signed into law. The BPRA requires the New York Power Authority (NYPA) to develop and own renewable energy and battery storage projects and to provide only renewable energy and power to customers, with the CLCPA required 70% of energy to be sourced as renewable by 2030 and 100% to be zero-emissions by 2040. However, last fall, Justin Driscoll, NYPA CEO, proposed only 3 gigawatts (GW) of renewable energy. Due to public pressure, NYPA is now revising its plan to 7 GWs of renewable energy. Increasing the plan to 7 GW is a step forward, but it remains a half-measure in the face of increasing climate devastation. NYPA must double its efforts and build the 15 GW that New York needs—at a minimum— to comply with the CLCPA.

Both Governor Hochul and NYPA are flouting the 2019 CLCPA law. Building the expected and agreed upon 15 GWs of renewable power would help to ensure that the state will meet its climate goals. The CLCPA also specifies that the “state wide electrical demand system should be zero emissions by 2040. It includes technology specific targets for off-shore wind, solar and energy storage resources. Renewable energy includes solar photovoltaics, on-shore and off-shore wind turbines, tidal/wave energy systems (still in development) geothermal and geothermal networks, energy efficiency improvements and demand response measures, battery and battery storage, transmission lines and infrastructure.

NYPA should ramp up their pace of adding projects and beginning construction to take advantage of Federal solar and wind tax credits prior to their expiration, and commit to developing alternative financing methods to bring more renewables online regardless of federal tax credits such as expanded bond financing.

In the Governor's June 23, 2025 news release, she directed NYPA to build one new nuclear energy facility with a combined capacity of at least 1 GW of electricity. Then the Public Service Commission (PSC) proposed that up to \$33 billion in ratepayer subsidies continue from 2029 to 2049 for the four existing aging reactors upstate, as estimated by the Nuclear Information & Resource Service (NIRS). This represents a massive expansion of the \$7.6 billion ratepayer subsidy bailout put into place under Governor Andrew Cuomo to keep the upstate nuclear plants operating. Ratepayers are still paying for this subsidy. This represents an irresponsible use of ratepayers' financial resources.

Additionally, the seven reactors in the state have accumulated approximately 5,000 metric tons of high-level radioactive waste which is stored across the five nuclear plants at a cost of \$35 million a year. Uranium-235, a significant component of this waste, has a half-life of 700 million years. New York State lacks a long-term plan on how this waste will be managed, assuming instead that the Federal government will take care of it. At this point in time, there is no indication that the Federal government will take care of it. Thus, storage of nuclear waste remains a financial burden on the ratepayers, and an ever-present threat to our communities and our environment. NYPA should follow the CLCPA and communicate with Governor Hochul that nuclear power is a fiscally and environmentally irresponsible source of energy and should be phased out, not restarted.

The definition of renewable energy should never include nuclear power. Nuclear power facilities are not “Zero emission” of greenhouse gases (GHG). GHGs are emitted as a result of the milling, mining and enrichment of poisonous uranium fuel, and through facility construction which uses significant quantities of concrete and steel, and during the long-lived storage of high level nuclear waste. The Governor and NYPA must focus on the build-out of 15 GWs of renewable energy. BPPA empowers and requires NYPA to build public renewables, not nuclear power. Building the 15 GWs will increase jobs in the renewable energy field, approximately 8,000 workers in solar installation alone, for a total of approximately 20,000 to 30,000 green union jobs. The AFL-CIO and Building Trades Council, which together represent 2.5 million workers in NY State call for a large-scale build-out of renewable energy projects to guarantee job stability for their members.

The time to do this is now. NYSERDA programs allow low income ratepayers to receive much needed assistance on their utility bills. As we write this, federal money and credits are being clawed back as President Trump terminates Inflation Reduction Act tax credits and stops offshore wind projects in federal waters. New York State must fight back. We cannot afford attrition – resources must be deployed now. Instead of spending billions of dollars on nuclear energy the state must invest in renewable energy and get it distributed. Renewable energy installations are taking over the market and are quick and relatively inexpensive to build.

As NYPA knows, NYSERDA conducted a 2024 Financial Assessment on Advanced Nuclear Technologies that found it would result in astronomical costs to ratepayers and huge liability risks to the state. NYSERDA recommended that the state should not invest or act on any new nuclear energy facility. The Governor’s obsession with nuclear energy is irresponsible. The state can have a clean, green climate-disaster fighting machine with renewable energy, battery storage and energy reduction through geothermal heat pumps. Instead of spending billions of dollars on nuclear energy we should be investing all our funding into renewable energy projects. NYPA should ramp up their pace of adding projects and beginning construction to take advantage of Federal solar and wind tax credits prior to their expiration and commit to developing alternative financing methods to bring more renewables online regardless of federal tax credits such as expanded bond financing.

Disadvantaged communities, which bear the brunt of pollution from fossil fuels and nuclear power facilities, continue to suffer from the pollution that impacts their health

and environment. The state must not allow the continued use of fossil fuels – the constant and expensive repairs and build-outs by utility companies, the outrageous rate hikes suffered by ratepayers and the use of peaker plants which are always sited in disadvantaged communities. Fossil fuel-powered peaker plants must be shut down. We urge NYPA to commit to building enough downstate generation projects to replace NYPA's methane gas peaker plants by 2030, as required by law. Again, peaker plants are a public health disaster for host communities, which are already heavily burdened by other polluting infrastructure.

The foundation for NYPA's renewable energy portfolio increase to 15 GW is greatly assisted by the PSC approved \$8 billion in transmission investments for the integration of renewable energy sources. The Draft NY State Energy Master Plan (SEMP) recommends that the state needs to meet the CLCPA targets as expeditiously and cost effectively as possible. That means renewable energy now - by building the agreed to 15 GWs, while at the same time creating more union good paying jobs. The SEMP also stated the state should build out distributed solar through NY-Sun to achieve a 10 GW target and leverage Statewide Solar for All as a cost-effective way to drive additional development. The report also recommended that the state support strategies that expedite and streamline development including advancing Clean Energy Zones and leverage NYPA's authority to build renewable energy generation resources. NYPA must build 15 GWs of renewable energy, as quickly as possible.

Governor Hochul and NYPA need to put every resource into the generation, storage, transmission and distribution of renewable energy by 2030. It will be a win-win that lowers energy costs for everyone, provides good clean energy union jobs and contributes to cleaner air, water and land for all New Yorkers.

Dear New York Power Authority,

As a longtime New York resident and supporter of renewable energy and community-driven development, I am writing to express my support for the New York Power Authority's (NYPA) updated draft plan proposal released in July 2025, which calls for seven gigawatts of new solar, wind, and energy storage capacity. This bold initiative, more than doubling the original target from three gigawatts to nearly seven gigawatts across 64 proposed projects, demonstrates the forward-thinking leadership New York needs to meet its climate goals and address the growing demand for reliable, sustainable energy. I stand with countless New Yorkers who want clean energy built right here in our state. **15 gigawatts to realistically supply the growing needs of our state.**

I am also voicing my support for EDF's Rosalen Solar+Storage Project, a proposed up to 200 MW solar photovoltaic and 20 MW battery energy storage facility located in the towns of Rose and Galen, Wayne County. The Project will safely generate enough clean, renewable electricity to power 52,000 New York households.

Having seen EDF's results at the 177 MW Mt Morris solar installation, I came to understand how partnerships with unions, local, and state agencies to build solar and battery storage projects can deliver long-term value to communities, landowners, and surrounding areas. These projects foster cooperation when relationships are built from the ground up, creating reliable, long-term income streams for families, helping preserve farms, and sustaining local economies.

Solar energy, being clean, quiet, and regenerative, allows land to rest while contributing to statewide reductions in emissions and improved air quality. Additionally, battery storage enhances grid reliability, reduces outages, and ensures energy availability during peak demand, a growing concern as our dependence on electricity increases. These projects also generate local tax revenue, fund infrastructure improvements, and often provide broader benefits, such as equipping small departments of local first responders with much-needed new equipment and lifesaving tools, all without overburdening local services.

The inclusion of 20 new renewable generation projects and 156 energy storage projects, contributing over 3.8 gigawatts of additional capacity, reflects NYPA's genuine commitment to action and progress. I urge all relevant decision-makers to maintain this momentum to power New York's future. The public's support is not merely symbolic - it is a mandate. As a proud New Yorker, I encourage you to seize this opportunity to invest in projects that will make our energy system cleaner, more reliable, and more equitable for generations to come.

Signed,

Heidi Beutler



State of New York
County of Broome Government Offices

Department of Planning and Economic Development

Jason T. Garnar, County Executive · Anthony F. Fiala, Jr., Commissioner

September 10, 2025

Justin E. Driscoll
President and Chief Executive Officer
New York Power Authority
123 Main Street
White Plains, NY 10601-3170

RE: 2025 NYPA Renewables Draft Updated Strategic Plan

Dear Mr. Driscoll,

Please accept these comments regarding the 2025 NYPA Renewables Draft Updated Strategic Plan.

The Climate Leadership and Community Protection Act of 2019 (CLCPA) put forth goals with respect to emissions and electricity generation. These goals include: achieve net-zero greenhouse gas (GHG) emissions by 2050; generate 100% zero-carbon electricity by 2040; and ensure at least 70% of the state's electricity is from renewable sources by 2030. The CLCPA also directs 40% of the benefits/funding from clean energy programs to disadvantaged communities.

The 2023 -2024 State Budget included a mandate for NYPA to cease fossil fuel generation at its small natural gas power plants (SNGPP) by the end of 2030. Currently, NYPA operates 11 SNGPPs/

The draft updated Renewables Strategic Plan outlines the path the New York Power Authority (NYPA) will follow to work toward these goals. The plan seems to fall short in planning only 7GW of electricity generation by renewables. Understanding the current grid capacity and the anticipated increase in electricity demand from uses such as AI data centers, the proposed amount of electricity from renewable sources seems low.

A review of the NYPA Project Map and Project List, reveals that no renewable projects are proposed within Broome County. This is a missed opportunity. In 2024, the Broome County Energy Action Plan identified 286.5 acres of buildable area available for

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[Type here]

renewable energy among 11 high priority sites. Additionally, Broome County contains approximately 505 medium priority sites consisting of 17,686.2 acres, and approximately 91 low priority sites consisting of 3,306.8 acres.

Broome County includes 21 NYS designated Disadvantaged Communities (DAC). Many of the available sites for renewable energy projects are located within these DACs.

Understanding that it will take the cooperation and participation of all NY jurisdictions to meet the extensive goals of the CLCPA, NYPA should amend the draft update to the Renewables Updated Strategic Plan to consider sites within Broome County for future renewable energy projects.

Sincerely,

A handwritten signature in cursive script that reads "Aimee Dailey".

Aimee S. Dailey
Senior Planner

Cc: File



Business Council of Westchester

**Statement in SUPPORT of the 2025 NYPA Renewables Draft Updated Strategic Plan
& Urging an INCREASE in the Plan to 15 Gigawatts
for Grid Resiliency, Economic Growth, Energy Affordability & Equity Leadership
Presented at the Public Hearing – August 20, 2025**

Good evening.

My name is Ron Kamen. I am the Program Director of the Business Council of Westchester's Clean Energy Action Coalition.

As Westchester County's largest business membership organization focusing on economic development and advocacy, the BCW has been laser focused on Westchester's changing energy landscape. In 2024, BCW formed the Clean Energy Action Coalition (CEAC) which now consists of over 110 BCW members who are leaders in the renewable energy sector. The goal of CEAC is to create a collaborative initiative that accelerates clean energy adoption across Westchester County by constructing new, reliable, resilient, safe, and affordable energy infrastructure.

I would like to start off on commending NYPA for the impressive capacity that is outlined in this update to the strategic plan. When you rolled out the initial plan you said that you would do more to support the development of renewables in New York - and you did.

The BCW's Clean Energy Action Coalition (CEAC) supports the **NYPA Renewables Draft Updated Strategic Plan and urges that the Plan be increased to 15 GWs of new renewable generation resources.**

The New York Independent System Operator (NYISO) oversees the New York State Electric Grid. NYISO reports that New York's electric system **is reaching critical electric capacity shortages, which will result in blackouts and brownouts.** In addition, extreme weather events are becoming more violent and frequent, increasing the probability of electricity outages.

The **2025 NYPA Renewables Draft Updated Strategic Plan will provide much-needed additional renewable energy that creates critical resiliency that will help avoid power outages.** It will also support **reduced electricity rates for decades**, helping to protect residents and businesses from utility price spikes.

NYPA boasts an impressive legacy centered around delivering reliable and affordable power to New Yorkers. Last year, the BCW Clean Energy Action Coalition followed NYPA on its journey to build new renewable energy resources, and we are proud to see that the important aspects of the inaugural strategic plan have not been abandoned in this update.

The least cost electricity in New York State comes from NYPA's investment in our hydroelectric power plants last century. NYPA's development and ownership of new renewable energy resources from the wind and sun will provide the same long-term cost and environmental benefits. By building, owning, and maintaining the resources, the fuel-free nature of renewables creates inexpensive electricity for perpetuity.

In addition, the NYPA plan includes developing and owning Battery Energy Storage Systems (BESS). New BESS is essential as New York modernizes its electric grid. BESS improves reliability, manages peak demand, and lowers electricity costs, especially during periods of grid stress. Updated safety codes—combined with robust local oversight—ensure protection for communities and first responders while enabling the benefits of clean, affordable energy.

The amount of storage included in this plan is particularly impressive. Infrastructure tax credits for storage projects remain largely untouched following recent federal actions, so it is good to see that NYPA has more than doubled down on this technology as it diversified its renewables portfolio. Comprehensive battery storage systems are essential to the success of renewables. They help to stabilize the grid and ensure reliability even when the sun is not shining or the wind is not blowing.

It is important that NYPA continues to engage public stakeholders, support economic opportunities and workforce development, and support low-income households through the REACH program. We are happy to see that the holistic approach to building renewables has advanced, especially as it relates to the REACH program. It is welcome news that all the DG-scale storage projects included in the plan will be considered under REACH.

NYPA brings proven experience operating safe, large-scale energy storage, including a Northern New York facility praised by local officials for exceeding safety standards.

Lastly, NYPA's REACH Program (bill credits by 2027), Workforce Development (\$25M annually), Environmental Justice initiatives, and Decarbonization Leadership Program will build the critically important workforce while providing environmental justice to low-income communities.

As a leader in renewable energy initiatives, NYPA has consistently demonstrated the foresight and capability to adapt to the ever-evolving demands of our time. The BCW CEAC has no doubt that their strategic investments in new renewable generating projects will transform our energy infrastructure, reduce greenhouse gas emissions, and set new benchmarks for environmental stewardship.

The BCW CEAC is confident that NYPA will continue to build new renewables projects with the same level of dedication, expertise, and responsibility that has defined its operations for decades, and we support the approval of the **2025 NYPA Renewables Draft Updated Strategic Plan**.

However, we urge that the Plan be increased to 15 GWs to provide additional critical grid benefits, generate economic growth, deliver local tax revenues, help reduce energy costs, and align with New York State’s climate and resiliency goals.

In closing, on behalf of the 110 members of the Business Council of Westchester’s Clean Energy Action Coalition, I would like to thank NYPA for their unwavering commitment to innovation and sustainability. Together, we are paving the way for a brighter, cleaner, and more resilient and affordable energy future.



Caiazza Comments on Draft 2025 NYPA Renewables Strategic Plan

The 2023-24 enacted State Budget authorized and directed the Power Authority of the State of New York (NYPA) to engage in the largest expansion of the Authority's responsibilities in decades to [advance renewable energy](#) and support other state priorities. The 2025 [Draft NYPA Renewables Strategic Plan](#) (Draft Plan) is the second edition of an outline approach for developing new renewable energy generation projects to supply New Yorkers with "affordable, reliable, emission-free electricity".

The primary driver for Climate Leadership & Community Protection Act (Climate Act) implementation and the NYPA Draft Plan for renewable development is [Public Service Law \(PSL\) Section 66-P](#), Establishment of a renewable energy program. It requires the Public Service Commission (PSC) to establish a program that meets the 2030 Climate Act mandates that a minimum of 70% of the statewide electric generation in 2030 is generated by renewable energy systems and the 2040 requirement that the statewide electrical demand system will be zero emissions. PSL 66-P also includes often overlooked boundary condition provisions. The PSC is empowered by this statute to temporarily suspend or modify these obligations if, after conducting an appropriate hearing, it finds that the PSL 66-P impedes the provision of safe and adequate electric service.

My comments argue that the NYPA Draft Plan must develop its own affordability and reliability boundary conditions to ensure that its plans maintain adequate and reliable electric supply. The Draft Plan guides NYPA's mandate to "plan, design, develop, finance, construct, own, operate, maintain and improve renewable energy generation projects to maintain an adequate and reliable supply of electric power and energy and support New York State's renewable energy goals established in the Climate Act". Technical staff at NYPA understand the impacts of renewable energy on the electric system whereas the legislators that promulgated the law requiring NYPA to advance renewable energy did not. Establishing constraints based on a comprehensive understanding of the electric system is a commonsense safeguard.

If there are no constraints, then it is very likely that there will be unacceptable consequences. Moreover, two things have changed since NY politicians expanded NYPA's renewable energy responsibilities that should be reflected in the 2025 Draft Plan. It has become clear that the costs to implement the Climate Act are significantly more than expected. There was a blackout on the Iberian Peninsula that was associated with solar generation. The Draft Plan should address both.

I [submitted comments](#) on last year's NYPA Renewables Strategic Plan that argued that the Draft Plan should be paused until completion of a comprehensive feasibility analysis. These comments suggest that if the boundary condition criteria are exceeded that implementation should be paused, and a feasibility analysis completed before proceeding.

Affordability

My overarching concern with Climate Act implementation is affordability. Since the last update to the NYPA strategic renewable energy plan [Governor Hochul has acknowledged](#) this problem, As part of local re-election outreach this summer Governor Hochul turned up at a western New York restaurant to discuss affordability issues. Buffalo TV Station WRGZ [2 On You Side](#) asked [\(video\)](#) about the effect of the Climate Act on consumer bills. She [suggested that a “slow down”](#) on the Climate Act was needed and costs are an issue:

We asked: "On affordability, you mentioned utility bills. Heard you say it, governor. Isn't it true that ratepayers are paying for that because of the climate change law. We do know the the Public Service Commission (in February 2023) actually allowed for increased rates to be able to pay for some of that, connecting various ..."

The Governor responded, "This law goes back a number of years."

At the end of her long response on utility rates and energy strategy, there was this summation from Hochul: "You're absolutely right. Utility costs are a huge burden of families, and I'll do whatever I can to alleviate that."

This is relevant for the Draft Plan because the Governor recognizes the goal of “affordable, reliable, emission-free electricity”. The affordable and reliable electricity goals are meaningless unless those terms are defined. The Draft Plan must acknowledge the PSL 66-P boundary conditions and recognize that the definitions are imprecise and [need to be to be refined](#) to properly protect New Yorkers. The fact that there is insufficient guidance should not mean that NYPA does not have the responsibility to address this problem. NYPA has the technical expertise to define its own criteria for affordable, reliable electricity that should be incorporated into the Draft Plan.

Reliability

On April 28, 2025, a problem at a photovoltaic plant in Spain triggered a blackout over the Iberian Peninsula. The Draft Plan must address the ramifications of this blackout.

Two recent articles at the Watt-Logic blog described the blackout that affected Spain, Portugal, and France. I include these descriptions because NYPA staff understand the problems but most New Yorkers do not. The [first article](#) looked at the physics of power grids and the general behavior of both synchronous generation (gas, hydro and nuclear) and inverter-based generation (wind, solar and batteries). Watt-Logic gives an overview explanation of the “importance of voltage control and reactive power” that were the root cause of the Spanish blackout. In short, the existing system depends upon synchronous generators that convert mechanical energy (spinning turbines) into electrical energy, producing alternating current that matches the frequency of the electric grid. These generators inherently provide important electric grid functions that are difficult to replicate with inverter-based resources like wind,

solar, and energy storage. The overarching problem is that not only do inverter-based resources not perform many of these necessary functions, but they can also de-stabilize the grid in certain, poorly understood circumstances.

The [second post](#) addressed what we know about the Iberian blackout. Watt-Logic explains that the blackout “demonstrated the importance of voltage control and reactive power, and how a weak grid, with poor controls, was brought down by a single faulty solar inverter.” The basis of the blog post was a “concise but informative [report](#) produced by Red Eléctrica de España (“REE”), the Spanish Transmission System Operator (“TSO”), which is more accessible than the much longer government report (available only in Spanish – rough English translation [here](#)).”

Watt-Logic lists the key messages from the REE report:

- The blackout was triggered by a PV inverter–induced voltage oscillation
- Inappropriate disconnections of wind and solar generation, and widespread failure of reactive power support, escalated the disturbance
- REE relied on static controls and failed to deploy dynamic response assets
- Grid code non-compliance was widespread among renewables, conventional generators, and even REE itself (via non-compliant transformers)
- The collapse exposes systemic risks in low-inertia grids with high levels of inverter-based resources (“IBRs”) and inadequate voltage control
- It is notable that, despite confident denials from some renewables advocates in the immediate aftermath, it was in fact a malfunctioning solar installation that triggered the voltage oscillation initiating the collapse. Wind and solar generators failed to meet fault ride-through obligations, and both inverter-based and conventional generators failed to provide the required reactive power support. Crucially, conventional generators did not trip prematurely – they remained online until system conditions breached their design tolerances.

The second reason that the Spanish blackout should be considered in the Draft Plan is because of the cost implications of providing ancillary services necessary for reliability. Many still believe the claim that solar is the cheapest form of energy. A recent [Doomberg blog explains](#) that after the blackout in Spain earlier this year “the true cost of solar can no longer be hidden from the public.”

The Doomberg post describes the blackout and the attempts by Spanish authorities to deflect blame away from the possibility that the problem was due to the solar facilities. Their post goes on: “As the results of the investigation became undeniable, responsibility was pinned not on solar but on the grid operators who had failed to make the necessary investments to handle the rapid influx of green electricity.” They noted that:

Last week, an expansive article in *Bloomberg Green*—confessionally titled “[The Fix For Solar Blackouts Is Already Here](#)”—captured this sentiment. It lamented that the penetration of solar and wind has outpaced the buildout of stabilization technologies such as synchronous condensers and grid-forming inverters. In other words, the renewables worked as designed, but the infrastructure to integrate them safely at such high percentages of supply lagged far behind:

“The result is huge spending on new wind and solar capacity, but not enough on grids. The 27 members of the European Union and the UK invest on average \$0.7 in grids for every dollar spent on renewables, according to BloombergNEF. Spain ranks the lowest, with only \$0.3 spent for every dollar.

Blackouts are causing political backlashes against renewables that politicians cannot afford right now. ‘Here’s the problem: Investments in the right infrastructure are not keeping up,’ said António Guterres, head of the United Nations, in a July speech. ‘That ratio should be one to one.’”

The NYPA Draft Plan does not mention this blackout and its implications. The authors of the legislation requiring that NYPA support renewables have a very superficial knowledge of the electric system. They subscribe to the presumption in simplistic academic energy studies which guided the Climate Act that generation and load are sufficient to predict success—that if there is enough generation to equal the load, no matter the quality of the source or where it is located, the system will work. Deflecting blame, renewable proponents now say that insufficient “grid investments” caused the Iberian blackout, not renewables. However, if not for an over-dependence on intermittent inverter-based resources, the unique grid investments to support them would be unnecessary. If renewables are expanded beyond the ability of the grid to compensate for the problems they create, then blackouts are inevitable.

NYPA has the technical expertise to define criteria for reliability standards necessary to address the observed problems that lead to the Spanish blackout. Appropriate criteria must be developed and used to guide renewable energy deployment.

Other Comments

In addition to its responsibility to provide boundary conditions to ensure affordable and reliable electricity, the expert staff at NYPA need to confront the emotion-driven rhetoric of uninformed clean energy advocates when their claims do not meet technical standards necessary for policy decisions. Such comments often begin with the demand that NYPA must double its efforts and build the 15GW that New York needs “to comply with the CLCPA, lower electricity bills, create 25,000 green union jobs, and end our fossil fuel dependence.”

The comments demanding that NYPA “must build 15 GW of public renewable energy by 2030” ignore reality. Numerous implementation issues have delayed deployments to the point where the [Clean Energy Standard Biennial Review](#) admits that the 70% renewable energy by 2030 target will not be achieved. There should be no expectation that NYPA can accelerate its deployment substantially for the same reasons.

The myth that wind and solar will lower electricity bills is evaporating as described in the section addressing the Spanish blackout. It is not enough to just build renewable energy. Investments in grid infrastructure cited by the head of the United Nations must be made. These include transmission, storage, dispatchable backup generation, and grid-stabilizing improvements to compensate for inverter-based technology. However, all of these add to total cost of the system.

Commenters claimed without any evidence that building 15 GW of renewables would “create 25,000 green union jobs”. Too often New York’s energy policies have ignored experiences in other jurisdictions that have already tried to pursue a net-zero transition. David Turver has described the [cost of green energy jobs](#) in the United Kingdom. One of the points he makes is that number of green jobs means that the energy sector is becoming less productive. Most of these jobs are utterly dependent upon subsidies which adds inefficiency. He concludes:

We can see that each offshore wind job cost £264K in subsidy, each onshore wind job cost over £309K and solar nearly £100K. The average across all three sectors is over £192K per job.

At the current exchange rate, the average across all three sectors is over \$259,000 per job. This leads to the question that the Draft Plan must address. Who is going to pay for those subsidies?

The claim that deploying more renewables will “end our fossil fuel dependence” ignores society’s broader dependency on fossil fuels. Ronald Stien has [made the point](#) that “the world’s 8 billion are dependent on more than 6,000 products made from the oil derivatives manufactured from crude oil”. Furthermore, until [dispatchable, emissions-free resources](#) are deployed New York’s electric grid has to rely on dispatchable fossil fuel generators. Deploying excess renewable energy affects the economic viability of the backup fossil fuel generators and will likely lead to subsidies to maintain that necessary support.

Conclusion

The current Climate Leadership & Community Protection Act (Climate Act) PSL 66-P implementation plan relies on wind and solar generation because the authors of Climate Act asserted that the plan would work with existing technologies and would be cost effective. However, no jurisdiction anywhere has successfully developed an electric system that relies on those resources to the extent proposed by the Climate Act. In comments submitted last year, I argued that it is premature to advance renewable energy as proposed unless and until a demonstration project has been completed that proves that the proposed wind, solar, and energy storage approach can produce affordable, reliable, emission-free electricity. Events that have occurred since then reenforce this. The Draft Plan should be paused until completion of a comprehensive feasibility analysis outlining how issues raised in these comments and elsewhere can be addressed without affecting the mandate for reliable and affordable electricity. As an alternative, the Draft Plan must define safety valve criteria for affordability and reliability metrics. If the safety valve criteria are exceeded then implementation should be paused until alternatives that will not adversely affect affordability and reliability are identified and proven in a demonstration project. This approach is the only way to ensure that actions in the Draft Plan do not cause unaffordable and unreliable energy.

I submitted this comment because I believe that the unresolved issues associated with inverter-based resource deployment pose significant risks to reliability and affordability. For too long the electric energy system experts in New York have danced around the consequences of the flawed analyses that form the basis of the Climate Act mandates and schedule. The enabling legislation that directs NYPA to double down on wind and solar development without addressing the unresolved issues continues that ill-fated approach. Safety valve conditions that trigger feasibility analyses if exceeded are necessary before proceeding. The opinions expressed in this document do not reflect the position of any of my previous employers or any other company I have been associated with, these comments are mine alone.

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September 11, 2025

Comments on New York Power Authority's Renewables Conferral Process

Gary Abraham, Benjamin Wisniewski and I participated in the NYPA conferral process last year, and we produced extensive oral and written comments to the same four questions that are being re-posed to conferral participants this year. Rather than continue as lone lawyers advocating by ourselves for a sane, effective, affordable and environmentally sound energy policy for New York State generally and NYPA, specifically, we have merged forces with thousands of other legal and engineering professionals, interested citizens groups and other concerned individuals, by joining "Stop Energy Sprawl" ("SES") a significant coalition of like-minded advocates, to provide this year's comments. Our ranks continue to grow by the week, as more and more rural upstate communities find themselves targeted by predatory wind and solar developers—aided by New York State and its unrealistic, fantastical and fiscally unsound energy plan.

NYPA's conferral questions have not changed, and neither have the answers. Thus, I have attached last year's written comments to this 2025 letter. The comments remain on point and salient and focus on the need for nuclear build out, and the need to minimize the development of wind and solar.

The one small bright light in NYPA's current strategic plan, appears to be the recognition (finally) that nuclear deserves a place at the table (from our perspective, it deserves the lion's share of room at the table) when it comes to pursuing energy that has some hope of meeting New York's voracious and growing electricity needs, stabilizing the grid and achieving an emissions free future.

An additional note on affordability--under the current NYPA strategic plan, which unduly focuses on solar and wind--energy poverty will continue to expand in New York. New York has the sixth most expensive electricity prices for residential customers of any state in the U.S. mainland, according to U.S Energy Information Administration data. An increasingly strained grid will require a 255% increase in transmission infrastructure between New York and New England to support mandated clean energy development, the U.S. Department of Energy also found in 2023. The cost of building new energy infrastructure in New York is significant. The New York State Energy Research and Development Authority approved a slate of land-based renewable projects in 2023 for about \$95 per megawatt hour. That is more than double the market price for electricity as of 2024, according to the New York Independent System Operator.

I attended hearings held by NYPA on its strategic plan. The large number of uniformed, thoughtless speakers parroting lines clearly scripted by allegedly "independent" interest groups (that are absolutely financially supported by the wind and solar lobby) to the tune of "15GW of wind and solar buildout now to save the earth" and "solar and wind are the least expensive forms of energy," was simply mind boggling, very sad, and demonstrates the general prevalence of energy system ignorance. The costs of attempting to integrate intermittent renewables into the

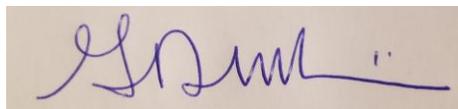
current power system will be astronomical. No one has meaningfully assessed the emissions reduction attributable to renewables. In order to truly understand the cost, a life cycle assessment must be insisted upon. Once that is done, the environmental case for renewables quickly disappears. Frankly, it may be impossible to offset the emissions generated to create renewable energy projects, with the apparent low-emissions electricity generated.

Continuing the path towards buildout of more solar and wind will make a mockery of the following stated NYPA goal: *“With the opportunity to become a leader in responsible development of new renewable generation, NYPA aims to expeditiously build affordable projects, staying grounded in our commitment to the communities in which we operate now and in the future, all while ensuring fair and family-sustaining worker wages.”* One does not “sustain” a family with wages from building a wind or solar project, which is only temporary construction work, work which is most often awarded to out-of-town builders employed by the solar and wind developers, project after project, state by state. When complete, solar installations *at best* provide one or two full-time jobs. When completed, wind projects provide a handful of jobs. After promising to employ local labor on the construction of the reviled Alle-Catt wind project, it is now clear to my constituents (who are hosting hordes of out of state workers) that the developer’s promise of utilizing local labor, was nothing short of fraudulent. Contrast the meager full-time permanent jobs created by wind and solar installations, to that of nuclear plants, which plants provide for hundreds of jobs, at top wages and benefits, for *generations*.

Nuclear is the path that NYPA must heavily champion. Advanced nuclear power is not only essential to achieving New York’s climate goals, but it is also crucial to providing abundant reliable energy that is mission-critical to future economic growth and prosperity, supporting energy intensive manufacturing and data centers, and further expanding a skilled and well-compensated workforce. By serving as part of the backbone of an efficient electric system rather than simply backup to intermittent sources, advanced nuclear will ensure that New York meets its climate and economic objectives with minimal impacts to land and natural resources.

Thank you for the opportunity to comment. If you should have any questions, please do not hesitate to telephone or email me.

Respectfully Submitted,



Ginger D. Schroder

My name is Nicole Dillingham. I reside near Cooperstown New York and am a retired attorney, previously licensed in California and New York. I have been a Board Member of Otsego 2000, an organization located in Cooperstown, New York, concerned with historic preservation and environmental protection, for more than 20 years. I am greatly concerned that the plans being considered to construct solar and wind projects in upstate New York will do more harm than good.

There is no question that we must reduce GHG emissions to protect the environment. However, we must not destroy upstate New York in a flawed effort to protect it. The wrong decision risks squandering tax dollars, destroying the landscape, and still failing to achieve our GHG reduction goals. This is a trifecta we must avoid.

The sacrifice of prime agricultural lands, significant historic sites, protected endangered species, and an economy based on agriculture and tourism, should not be taken without a plan that is projected to work. Sadly, there is no evidence that the wind and solar energy projects proposed can meet NY's energy needs, or legally required GHG reduction goals. This is because wind and solar energy is intermittent and must be supported in NYS by imported natural gas (with attendant pipelines and compressor stations) to supply power when wind and solar resources are insufficient.

New Yorkers proudly banned fracking in NYS. Yet many ignore that NY imports huge quantities of fracked gas from Pennsylvania, every day, to support NY's energy needs. Fracked gas is extremely damaging to the environment and is responsible for huge GHG emissions. Reliance on intermittent wind and solar, supported by fracked gas, will not meet NY's GHG reduction targets. To argue that this is possible is hugely misleading.

I urge NYPA to pivot toward developing reliable "new" nuclear power to power both upstate and downstate NY, rather than the unreliable and environmentally damaging solar and wind facilities being proposed.

Respectfully submitted, Nicole Dillingham

Thank you for the opportunity to add my thoughts to the discussion of NYS's electrical power plans and more particularly, the NYPA Strategic Plan.

I applaud the inclusion of enhanced nuclear power in the NYS energy mix. Indeed, the USDoE published a report detailing 7 sites in NYS which DoE declared as promising sites for enhanced nuclear construction. Since both Gov. Hochul and Secretary of Energy Wright support nuclear, it is reasonable, politically, for the NYPA to build nuclear. *Please see the attached Eval of NPP and CPP Sites.* I support nuclear technically because it is dispatchable, compact, robust, and reliable, made in America, can grow our economy, and that actually can replace fossil fuels-characteristics far more important than political ones to the residents of NYS.

Wayne County Supervisors passed a unanimous resolution on July 16, 2024 in advance of Gov. Hochul's Syracuse Renewable Summit:

- RESOLVED that the board expresses its support for the continued operation of the Robert E. Ginna Nuclear Power Plant; and be it further
- RESOLVED, that this body again urges full consideration of Wayne County as a site for any new nuclear facilities that may be developed to assist in meeting NEW York State's goals for reduction in carbon emissions.

The NYPA should immediately explore Wayne County as a site for nuclear power construction.

I strongly oppose the NYPA adding more solar and wind to the NYS energy mix. This is wishful thinking. Doubling down on bad CLCPA/RAPID policy will only challenge the NYISO/grid, raise utility costs, gobble up and poison sacred sites and farm land while creating local landfill crises when renewable energy components must be landfilled or "recycled".

My home's electricity comes from Nationalgrid which occasionally provides information on the fuels it uses to produce that power. I will list the fuel components from the years of 2017 and 2021 respectively: Coal (3%, 2%); Hydroelectric (19%, 14%); Natural Gas (37%; 50%); Nuclear (35%, 27%); Oil (<1%, <1%); Solar (<1%, 2%), Wind (3%, 2%) and assorted other fuels like biomass, solid waste, etc.

Of these listed fuels, it's clear that I depend on hydro, natural gas and nuclear for reliable, consistent energy. In western NY, we are blessed to generate 80-90% of our power with carbon-free energy (hydro and nuclear) sources. *Richard Dewey, President of NYISO said in an April, 2023 interview published in the Rochester Democrat & Chronicle that "We're probably curtailing*

right now.” If we are curtailing nuclear and hydro to add the paltry solar/wind/biomass/solid waste and then backing up the intermittency with natural gas, that is just wrong! It is scientifically, socially and transparently irresponsible. Scientifically because natural gas is a polluter; socially because the CLCPA promised relief for DACs, utility ratepayers are bearing the costs of the CLCPA and valuable acreage and home rule are lost; and transparently because all the press releases coming out of Albany with the exception of those from Comptroller DiNapoli and NYISO fulsomely laud the state’s progress towards achieving its renewable goals in the face of warnings from NYISO, FERC and NERC.

Nationalgrid very recently announced requests for utility rate increases. Gov. Hochul stated that the increases would be too steep for residents. Yet savvy residents know a contributing cause of rate increases stem from the addition of renewable energy because these intermittent power sources require backup dispatchable ones.

I live near the permitted Invenergy Horseshoe Solar (HSS) energy project. I firmly believe that the rich, documented Seneca Indian residencies along the Genesee River should have been sufficient for SHPO to take a more robust role in denying the HSS project plans. The last “word” from the ALJ in the HSS Article 10 proceeding was that the issue of sacred land would be dealt with next. But Invenergy moved to ORES control and the issue was conveniently ignored. Local residents like myself are sickened by the PR announcements of Invenergy and NYS proclamations of 180MW of electricity when we know that western NY’s clouds and latitude mean that HSS will be 20% productive. Thirty-six MW (20% of 180) is small justification for desecrating Seneca sacred ground, especially when the project was originally planned in Caledonia where the POI was on reclaimed quarry land, not Seneca graves. Horseshoe Solar will be built on Seneca sacred burial land, acknowledged by SHPO but with various mitigations completely unacceptable to many residents and the Seneca Tribal Historical Preservations Officer. This is cultural genocide.

The Environmental Protection Agency considered banning the import of any product containing PFAS, per- and polyfluoroalkyl substances, also known as “forever chemicals”; the documentation in *Long-Chain Perfluoroalkyl Carboxylate and Perfluoroalkyl Sulfonate Chemical Substances; Significant New Use Rule; Supplemental Proposal*, specifically mentioned imported solar panels. Eighteen Attorneys General asked the EPA to strengthen the rulemaking proposal. In North Carolina, GenX from solar panels poisoned streams and soils. GenX is the marketing name for the dangerous PFAS materials used on the solar panels.

PFAS is found in the coatings on electrical wires, backing panels, tapes, and adhesives. Of particular concern is the use of PFAS in anti-reflective coatings (ARC) and anti-soil coatings (ASC) that are used to increase solar panel productivity. Material and Data Safety Sheets detail the contents of products manufactured in the United States. However, at this time, China is the major supplier of polysilicon solar panels and batteries. Accountability and transparency for materials and products made outside of the United States is questionable. In June 2021, the Biden administration banned the import and use of certain solar energy materials and products

from China due to the country's use of forced labor and genocide at polysilicon mines. Currently the Trump administration is negotiating tariffs on renewable energy materials exported by China or Asian countries used by China to evade tariffs.

Doubling down on renewable energy from solar and wind is not an option if one reads Comptroller DiNapoli's various reports. Our elected, not appointed, Comptroller continues to point out that the current renewable energy efforts are fundamentally flawed. *Politicians can make plans and wish for faster renewable energy options but physics, engineering and economics will always determine the costs and distributed resultant burdens of those plans and wishes.*

- The Comptroller's August 2023 report on renewable energy warned that NY's energy goals for 2030 are only within reach IF there is a 200% increase in gigawatt hours above the 2022 production levels. Is this likely? Additionally, he expresses concern that ratepayers have shouldered the \$6.7 billion spent between fiscal years 2008/9 and 2020/1 with another \$26.5 billion planned for transmission funding.
- The Comptroller's mid-July 2024 audit of NYSERDA and the PSC is also damning: use of outdated data, incorrect calculations, no forward planning, aggregated actual costs are unknown and no estimated ones available and no other sources other than ratepayers identified.
- The Comptroller's July 2024 report on the Clean Energy Fund administered by NYSERDA noted that the Clean Energy Fund is another drain on the state's ratepayers with plans to collect \$7.5 billion between 1016 and 1032 using surcharges on utility bills. A December 2022 review stated that the Clean Energy Fund had generally underspent budgets and underachieved performance targets.
- The Comptroller's report on NYS Agriculture in mid-August, 2024 mentions the challenge to agriculture, a \$2.7 billion contribution to the state's GDP and an economic engine to rural communities like mine, of increasing acreage of prime soils lost to solar installations.

I personally chafe at the removal of Home Rule by ORES/RAPID as I chose to live in an agricultural community on land that was purchased from one of my town's early families. The soil in my town is 75% prime soil, the type of challenging loss referenced by Comptroller DiNapoli.

It appears that New York is beginning to be concerned about the "recycling" of solar panels. The NYS DEC is exploring the reclassification of solar panels from "hazardous" to "universal" as noted in their July, 2024 Rulemaking- Adding Solar Panels to the Universal Waste Regulations- Request for Comment. <https://dec.ny.gov/regulatory/regulations/rulemaking-adding-solar-panels-to-the-universal-waste-regulations>

Stop Energy Sprawl (SES) is a group of individuals and citizens groups confronted with wind and solar installations in their communities.

Website: www.stopenergysprawl.org Email: StopEnergySprawl@gmail.com

To celebrate Earth Day, SES submitted carefully researched comments to the DEC and calculated the annual additions to landfills in terms of volume, weight and potential lead leachate.

The PV waste will not be distributed uniformly across the state landfills so the socialized costs of disposing/recycling renewable energy components will fall more heavily on some local taxpayers than others. New York State landfills cannot now accept hazardous materials. If the DEC reclassifies panels as “universal”, many landfills will be unable to accommodate the volume of renewable energy materials. SES analysis indicates that PV solar panel disposal in New York State will generate about 500,000 cubic yards (83,000 tons) of PV waste and 60 tons of lead per year by 2050, given the State’s current solar proliferation goals.

In the summer and fall of 2024, SES contacted 57 county waste management departments to see if the county accepted solar panels. Forty-six said PV materials were not accepted and most replied that local officials were worried about the future, absent state legislative activity surrounding the appropriate handling of PV waste. Six responded that the county “conditionally” accepted PV waste if their electronic waste partners would accept it. Five responded that they accepted PV waste, with charges ranging from \$50.00/panel to \$103.00/ton not including any hauling fees.

PLEASE, NYPA must prioritize non-polluting energy sources like hydro and nuclear. It must recognize that eminent domain and the lack of community oversight that respects the property rights of landowners, will pit community members against each other and against Albany elected officials.

I generally respect what NYPA has done in the past. I do not respect the major portion of NPA’s Strategic Plan concerning the addition of more solar and wind; it’s an expensive sham!

The New York Power Authority can make plans assuming the result will be faster and increased renewable energy options but physics, engineering and economics will always determine the outcome, costs and distributed resultant burdens of those plans and wishes.

Respectfully submitted,

Janet Glocker

791 Rush Henrietta TL Rd.

West Henrietta, NY 14586

cc. Senator Helming and Assemblywoman Bailey

**Comments of the Green Education and Legal Fund to the
New York Power Authority Renewable Energy Strategic Plan
September 11, 2025**

Pursuant to the Build Public Renewables Act, NYPA must build at least 15 GW of public renewables (wind, solar, geothermal) by 2030 so New York can lead the fight for our future.

As we face life-threatening heat waves, flash floods, skyrocketing energy bills, and an attack on climate action from the federal government, we need NYPA to lead the nation on building public renewables that will slash pollution, make energy more affordable, and protect our planet now.

We have the technology needed to build a clean renewable energy future, what we lack is the political will. We need a mobilization of all the state's resources comparable to what FDR did after Pearl Harbor. The Secretary-General of the United Nations has pointed out that the slow action by governments on climate change has opened up the Gates of Hell. For much of the last 2 years, global warming has already breached the 1.5 °C cap set by COP in France.

Building 15 GW will protect our climate, create green union jobs, cut life-threatening pollution, and make New Yorkers' energy bills more affordable.

NYPA must build at least 15 GW of renewables by 2030 to:

- Ensure that we meet our climate goals (70% renewable by 2030)
- Lower utility bills for New Yorkers who need relief the most
- Create 25,000 green union jobs
- Close super-polluting Peaker plants on the timeline required by law

NYPA needs to implement the authorization provided in prior state budgets to provide electricity to Community Choice Aggregation (CCAs) by building at least 5 GW of new renewables dedicated to supplying CCAs.

NYPA should take over ownership and control of the transmission grid through eminent domain to reduce barriers to renewable energy projects to connect to the grid and to lower costs for consumers

NYPA should not build new nuclear power plants as they are too expensive, take too long to build, are not carbon free, and produce significant amounts of radioactive waste that must be safely stored for tens of thousands of years.

Shortcomings of the Draft Plan

- **The 7 GW of proposed capacity in the strategic plan is still inadequate to meet CLCPA goals.** According to NYPA's own report, New York is currently on track for just 44% renewable electricity by 2030, vs. the 70% required by the CLCPA. NYPA must build at least 15 GW to get us back on track. NYPA, in their strategic report, also states that they expect "attrition," meaning that even fewer projects than are being proposed will actually be built.

- **Not enough projects planned for the Hudson Valley and downstate New York:** though this plan is an improvement, there still needs to be more downstate generation where electricity demand is greatest. Communities in these areas deserve to benefit from reduced pollution, green jobs, and lower utility bills via the REACH program. And congested electricity transmission is a problem that siting close to demand can help solve.
- **There is no detailed plan for shutting down NYPA's Peaker plants by 2030 as required by law.** Gas-fired Peaker plants are a public health disaster for host communities, which are already heavily burdened by other polluting infrastructure.
- **Less than 5% of proposed projects are to be sited on public land or institutions.** Public institutions throughout New York would benefit from decarbonization through NYPA renewables, thermal energy networks, and related retrofits.
- **The draft plan does not incorporate feedback from important labor organizations through the conferral process.** The AFL-CIO and Building Trades Council, who together represent 2.5 million workers in New York State, call for a buildout of 15 GW by 2030. IBEW, which represents workers directly impacted by our energy transition, calls for a large-scale buildout to guarantee job stability in the future for its members.
- **In its presentation of NYPA's financial situation, the draft does not assess the impact of the Authority's economic development operations, which currently provide massive energy discounts to multinational corporations like Citibank, Amazon, and Lockheed Martin.** Some of these discounts could be redirected to capitalize renewable energy projects or reduce New Yorkers' skyrocketing energy bills.
- **While the draft plan indicates NYPA's intention to partner with communities to develop distributed energy resources, there are no plans or timelines for these projects.** Communities should not have to wait for a revised plan a year from now to benefit from distributed energy projects. NYPA distributed energy should include geothermal energy systems, not just solar and storage.

NYPA Must Build More Renewable Energy

GELF's recommendations for NYPA include:

- **Increase the planned capacity to at least 15 gigawatts of new, publicly owned renewables by 2030.** That means 25,000 green union jobs, the end of "Peaker" plants polluting black and brown neighborhoods, and the kind of leadership that will carry this whole country's climate forward.
- **Ramp up their pace of adding projects** and beginning construction to take advantage of Federal solar and wind tax credits prior to their expiration
- **Commit to developing alternative financing methods** to bring more renewables online, regardless of federal tax credits, such as expanded bond financing.
- **Plan at least 5 GW for the Hudson Valley and downstate New York,** with more attention to distributed energy resources.
- **Fully decarbonize our public schools** by siting utility-scale and distributed generation on SUNY and CUNY campuses and K-12 schools statewide, building enough capacity to meet their energy demands.

- **Substantially increase the number of such projects sited on public lands**, in partnership with the Department of Education, MTA, and NYCHA.
- Ensure that enough capacity is built to create and sustain a pipeline of **green union jobs** for New Yorkers
- **Redirect economic development funds from large corporations** and towards renewable energy development, REACH funding, and Indian nations
- Plan additional projects on brownfield sites to turn polluted land to a positive use.
- **Make all projects REACH eligible.**

Speed up the Shutdown of Peaker Plants

- For too long, New York's energy has come at the expense of the health of our communities and our planet. It's time for a change. We need to shut down these smokestacks and replace them with clean public power that fights climate change, cleans our air, and puts money back in our pockets.
- The gas-fired Peaker plants are a clear symbol of the climate crisis and the ways New York's polluting energy system hurts our communities. For decades, these Peaker plants have spewed toxic fossil fuels pollutants into our air, burning the planet, and sending asthma rates sky-high in communities like the South Bronx, Williamsburg, Sunset Park, LIC & more. In communities like the South Bronx, Peaker plants like this have degraded our air and helped drive up asthma rates as much as 8 times the national average.
- The neighborhoods that suffer the pollution of Peaker plants don't see the benefits: wealthy areas and corporations get reliable energy, Black and brown communities get blackouts and dirty air.

No nuclear

Nuclear power is far too expensive, it will take far too long to develop to prevent climate chaos, and it has the enormous problem of dealing with the radioactive waste. It is not credible to say that nuclear is zero emissions, especially when the life cycle of the plant is analyzed as well as the mining and processing of the fuel.

According to the U.S. Energy Information Administration, the LCOE for advanced nuclear power was estimated at \$110/MWh in 2023 and forecasted to remain the same up to 2050, while solar PV estimated to be \$55/MWh in 2023 and expected to decline to \$25/MWh in 2050. Onshore wind was \$40/MWh in 2023 and expected to decline to \$35/MWh in 2050 making renewables significantly cheaper in many cases. Similar trends were observed in the report for EU, China and India.

Similarly, the [2023 Renewable Power Generation Costs](#) indicated that the global weighted average levelized cost of electricity for newly commissioned utility-scale solar photovoltaic, onshore wind, offshore wind, and hydropower projects experienced a downward trend. The most notable drop occurred in utility-scale solar PV, which saw a 12% decrease from 2022. Onshore wind projects also saw a reduction in LCOE, dropping by 3% year-on-year, while the LCOE for offshore wind projects decreased by 7% compared to the previous year. Meanwhile, the cost of battery storage projects experienced a significant decline, falling by 89% from 2010 to 2023.

In contrast, nuclear power continues to face cost overruns and long construction timelines. According to the 2023 World Nuclear Industry Status Report as of 2023, 58 nuclear reactors are

under construction globally, with an average of 6 years having passed since construction began—slightly lower than the mid-2022 average of 6.8 years. Despite this, many reactors remain far from completion. In fact, all reactors being built in at least 10 of the 16 countries involved have faced significant delays, often lasting a year or more. Of the 24 reactors clearly documented as behind schedule, at least nine have seen additional delays, and one has reported delays for the first time in the past year. <https://www.worldnuclearreport.org/Power-Play-The-Economics-Of-Nuclear-Vs-Renewables>

In the Governor's June 23, 2025, news release, she directed NYPA to build one new nuclear energy facility with a combined capacity of at least 1 GW of electricity. Then the Public Service Commission (PSC) proposed that up to \$33 billion in ratepayer subsidies continue from 2029 to 2049 for the four existing aging reactors upstate, as estimated by the Nuclear Information & Resource Service (NIRS). This is in addition to the \$7.6 billion ratepayer subsidy bailout under Governor Cuomo of the upstate nuclear plants that ratepayers are still paying for. Additionally, the seven reactors in the state are storing 5,000 metric tons of high-level radioactive waste on-site at a cost of \$35 million a year. Uranium-235, a key component of this waste, has a half-life of 700 million years. There is no long-term plan on how this waste storage will be funded, outside of the ratepayers. NYPA should follow the CLCPA and communicate with Governor Hochul that nuclear power is a fiscally and environmentally irresponsible source of energy and should be phased out, not restarted.

The definition of renewable energy should never include nuclear power. Nuclear power facilities emit GHG during the milling and mining of poisonous uranium and facility construction and the long-lived storage of high-level nuclear waste.

Instead of spending billions of dollars on nuclear energy the state must invest in renewable energy and get it distributed. Renewable energy installations are taking over the market and are quick and relatively inexpensive to build. NYSERDA programs allow low-income ratepayers to receive much needed assistance on their utility bills. As we write this, federal money and credits are being clawed back as President Trump terminates Inflation Reduction Act tax credits and stops offshore wind projects in federal waters. New York State must fight back. We cannot afford attrition – resources must be deployed now.

As NYPA knows, NYSERDA conducted a *2024 Financial Assessment on Advanced Nuclear Technologies* that found it would result in astronomical costs to ratepayers and huge risks to the state. While NYSERDA claims this assessment does not exist, the PSC in response to an FOI request acknowledged that it has a copy but claims that as an interagency communication it cannot release it.

NYSERDA recommended that the state should not invest or act on any new nuclear energy facility. The Governor's obsession with nuclear energy is irresponsible. The state can have a clean, green climate-disaster fighting machine with renewable energy, battery storage and energy reduction through geothermal heat pumps. Instead of spending billions of dollars on nuclear energy we should be investing all our funding into renewable energy projects. NYPA should ramp up their pace of adding projects and beginning construction to take advantage of Federal solar and wind tax credits prior to their expiration and commit to developing alternative financing methods to bring more renewables online regardless of federal tax credits such as expanded bond financing.

The New York Power Authority was only recently authorized to develop wind and solar energy projects. There are hundreds of private firms already in this business in New York. Rather than being just one more of several hundred, it is incumbent on the Power Authority to offer some value that the private sector is not already providing. We suggest two areas where this can be done.

1. Siting

Notwithstanding its name, the state's Office of Renewable Energy Siting does no siting. Private companies choose the sites, and ORES does whatever necessary to get the projects built at those sites. The results have been loss of prime farmland, clear-cutting of forests, harm to rare wildlife and elimination of rural viewsheds. Local protections for all these resources are routinely overridden. These are not exceptional cases, but have happened in most projects ORES has approved. A recent project was approved next to the Montezuma National Wildlife Refuge and another on karst soils in Schoharie County. Upcoming projects are proposed at the Chautauqua Escarpment. These are just a few examples.

NYPA could serve the state by being selective about project siting. Not all sites are suitable for wind or solar development, in spite of what ORES thinks. Allowing private companies to site projects wherever it is cheapest to build has aroused well-justified opposition in rural communities all over the state.

New York must balance its renewable energy needs with agriculture, wildlife, forests, wetlands and viewsheds. NYPA should restrict its participation to flat lands, not slopes, scrubland and abandoned farmland, not prime farmland or forests, and areas well set back and shielded from residences. Free of the profit motive, NYPA can develop on suitable sites, not just the cheapest land available.

2. Essential Reliability Services

Unlike conventional generation, wind and solar projects do not provide frequency control and inertia necessary for the electric grid to function. Due to their small share of the state's electric power, this has not yet been a problem in New York. However, it will become a serious threat as the "renewable" share of the state's generation increases.

This problem can be mitigated by using grid-forming inverters, which provide synthetic inertia, and synchronous condensers. The need for these is critical, and will become more so. Unfortunately, driven by the need to build wind and solar on the cheap, private companies continue to use grid-following inverters. NYPA must do better.

Finally, it must be noted that people who comment in such proceedings are those who feel most strongly about energy policy. A review of comments could lead the reader to perceive New Yorkers as hopelessly polarized. It is important to understand that commenters are not representative of the general population. It is in fact possible to unite the vast majority of New Yorkers behind a reasonable policy. Rather than doing that, the state has gone all-in on the preferences of a small minority, apparently in an effort to be perceived as a "nation-leading" fighter against climate change. A state that sacrifices its electric grid to get a better climate will wind up with neither.

Comments of Stephen Helmin

NYPA Draft Renewables Plan September 12, 2025

What is NYPA trying to hide?

NYPA's public hearings for the draft Renewables Plan continue to fail to reach those communities that would be most adversely affected by the buildout of the tranche of projects that NYPA has outlined, as illustrated below. The people living and working in the mostly rural communities targeted for so many of these projects are voices that NYPA needs to hear.

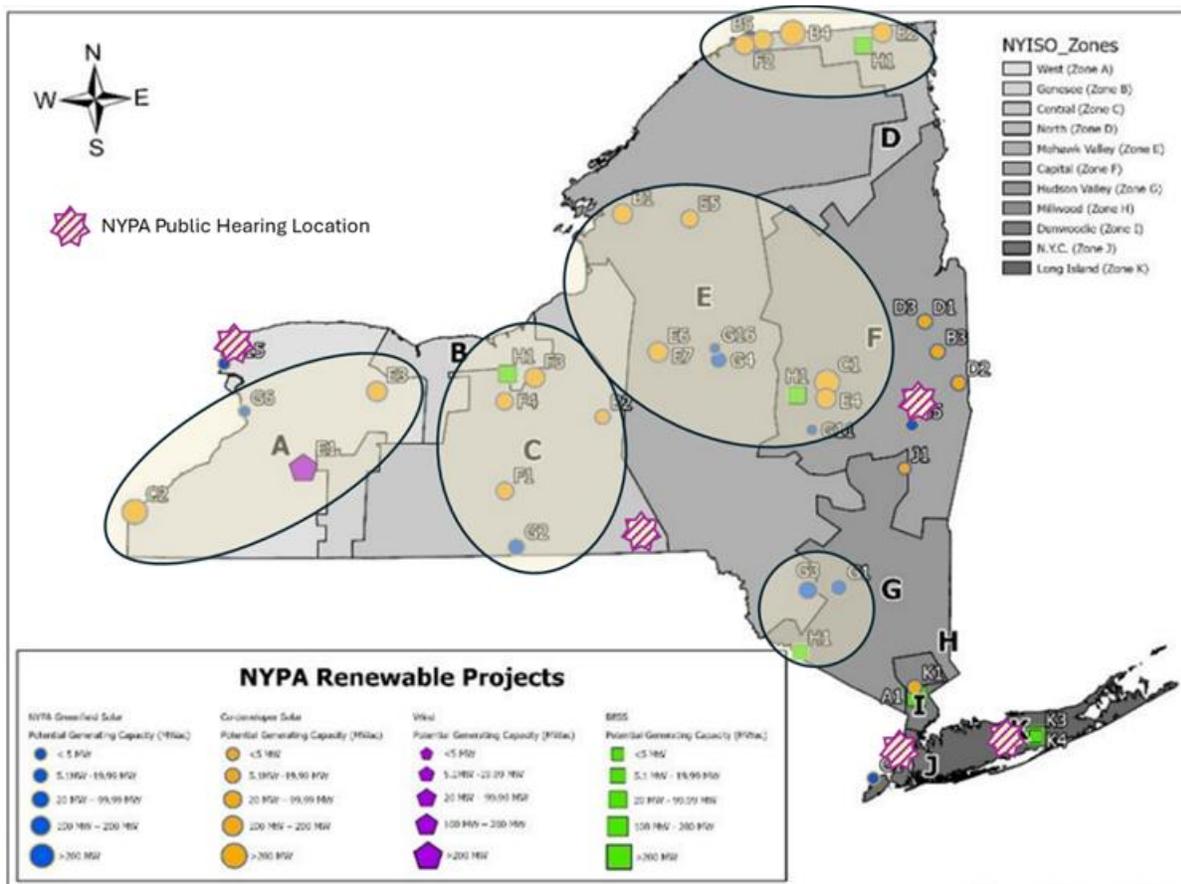


Figure 1: NY Power Authority's Initial "Tranche" of projects for 2025 from its October 8, 2024 draft Strategic Renewables Plan with areas of significant development highlighted demonstrating the inadequacy of NYPA's in-person hearings

NYPA's current map, like the previous incarnation, has been published at such a low resolution that the map key is nearly unreadable. Sadly, it shows the continued issue of a lack of outreach to the impacted communities. The public hearing process worsened, as NYPA opted solely for virtual hearings. This excludes those citizens who shun technology for personal or religious reasons, the elderly, the rural poor who often cannot afford or cannot access quality broadband or large data cell plans and rural residents, in general who live in areas poorly-served by cell or broadband service.

This latest "tranche" of projects continues to use pseudonyms such as "B1" and "C2" for the project names, turning NYPA's project list into a guessing game for communities seeking to offer effective input into NYPA's plans.

In Section 3.1.2, NYPA claims the plan "has been and will continue to be informed by significant stakeholder engagement. NYPA is committed to transparency and ease of access in stakeholder engagement processes." The obvious obfuscation of project names in the project list is neither transparent nor easy to use for project identification. Where designations (such as Document Matter Management number) exist from the Office of Renewable Energy Siting and Transmission (ORES) or local siting agencies, such designations should be listed. Additionally, the developer's project name should also be listed.

Further, NYPA does not address to what extent, if at all, the Authority has reached out to the communities targeted by its partner projects. From my own experience, I live in the town of Glen, NY which appears to correspond to Project C3 from the initial tranche. To my knowledge, NYPA has yet to reach out to anyone in Town government regarding the project, its long-range plans, or even its involvement in the project. Similarly, the partner company failed to notify anyone of its listing in the tranche of projects in conjunction with NYPA's release of the previous draft plan and was surprised when residents brought it up at a public meeting several weeks later. Lastly, NYPA's involvement is not a part of the ORES public record except in comments provided by community members.

These communications are essential. As a government authority, not only does NYPA have the right of Eminent Domain, it can pursue tax exempt status for properties it owns. Rural municipalities are already burdened by a tax assessment scheme that requires wind and solar installations be valued at a fraction of what comparable developments of other industries would be valued. NYPA's majority ownership requirement raises uncomfortable questions for municipalities. If there is a possibility that the property might be taken off the tax rolls or that NYPA might condemn adjoining properties, taxing authorities need the time to perform effective financial planning to compensate. In the case where NYPA assumes

control of a project following development, how would that impact any PILOT agreements or Host Community Benefit Agreements the developer agreed to?

On page 14, NYPA claims “a strong legacy of community engagement,” and continues “Our EJ team works as an internal advocate on behalf of communities to ensure that their concerns are prioritized and incorporated into NYPA’s strategic planning.” Glen is a Climate Justice workgroup-designated Disadvantaged Community (DAC). The lack of outreach to my community is a direct contradiction to NYPA’s claim.

Regarding Partner Identification and Vetting, NYPA lists the description of the characteristics used in its process, but fails to provide additional insight. There is no description of the comparative weighting of the characteristics or the metrics involved to evaluate each. While the referenced RFQ may provide additional information in this regard, NYPA should provide additional guidance in the Plan.

Some of the companies identified through the vetting process have few, if any, completed projects in New York. I fear that lack of accomplishment is likely associated with those “active but struggling” projects (Section 3.16) that NYPA has sought. I am concerned that the financial, socioeconomic and project risk from these potential partnerships is not adequately considered by NYPA.

I believe it unwise for NYPA to commit to bringing “at risk” projects to completion as outlined in Section 3.1.6.1., especially where the project has strong local opposition. Such projects suffer longer timelines and engender unneeded and unwelcome divisiveness in the targeted community.

Instances of active opposition to the project are rising and, increasingly, counties and other taxing districts are coming to the support of town residents. In these cases, NYPA’s involvement is likely to exacerbate that risk rather than alleviate it, being seen as additional government overreach. I have personally attended four public statement hearings for projects that are being pursued through ORES. Each of these projects have targeted small communities with populations from approximately 2500 to 5000 residents. All but one had over 200 people in attendance, a huge portion of the resident population. Those of us familiar with local organizations and government can attest to the rarity of getting that many residents to attend any type of community event. The ratio of attendees in opposition to the project compared to those in favor is typically around twenty to one. NYPA should avoid strongly contested projects.

Farmland Protection

On page 47, NYPA notes that it is prevented from participating in projects utilizing lands within an agricultural district or utilizing soils MSG 1-4. Many of the projects that NYPA is partnering with in its initial tranches do indeed consist of lands lying within an Agricultural District and / or utilize lands with MSG 1 - 4. For an example of one such project utilizing in excess of 2000 acres of land in an Ag District, please see various exhibits in Case 23-02972, especially the company's [memo](#) in response to County, Town and intervenor replies indicating some 329 acres of MSG 1-4. It is my belief that this project corresponds to project C3 in NYPA's inventory.

As a technology, agrivoltaics is in its infancy. I am unaware of any agrivoltaics projects on the scale of the larger projects in the NYPA portfolio nor any that have shown true market feasibility. Further, large-scale projects seldom include any plans for agrivoltaics. Finally, NYPA provides no minimum standard for the agrivoltaics project that may be claimed to qualify for such an exemption to the use of Ag lands. NYPA needs to clarify that an exemption that targets hundreds of acres of farmland will not be satisfied by three goats and a pickup truck.

Public comment

Much is made of the idea of "Public Renewables," in commentary on NYPA's plan. NYPA's plans to partner with private for-profit companies to build the initial "tranche" of projects seems to belie this title. Many of these private companies NYPA is partnering with are foreign or out-of-state. The large-scale facilities that will be built will be supported by large contracts from NYSERDA. NYPA lists those contract payments as required to meet costs. The primary "public" portion of the facilities in these cases will be the public money that is being spent to prop up NYPA's partners.

NYPA needs to better distinguish between the "Sound and Fury" of repeated cookie-cutter comments versus substantive well-considered comments. In our age of technology, it is a simple matter to provide "click here" buttons on websites and emails that can provide a momentary sense of satisfaction of "making a difference" (or whatever wish the solicitor seeks to fulfill) that reflect little more than a successful marketing effort rather than a well-reasoned and mature set of recommendations. NYPA should take into account the number of identical or near identical comments when attempting to recognize the value of public comment and not rely so emphatically on statistical results when undertaking initiatives of such great cost and public impact. Sound engineering and well-substantiated feasibility should rule the day.

Dear New York Power Authority,

As a lifelong New Yorker and long-time supporter of renewable energy and community-driven development, I am writing to express my support for the New York Power Authority's (NYPA) updated draft plan proposal released in July 2025, which calls for seven gigawatts of new solar, wind, and energy storage capacity. This bold initiative, more than doubling the original target from three gigawatts to nearly seven gigawatts across 64 proposed projects, demonstrates the forward-thinking leadership New York needs to meet its climate goals and address the growing demand for reliable, sustainable energy. I stand with countless New Yorkers who want clean energy built right here in our state.

Having worked directly with EDF power solutions on various boards and organizations, I have witnessed the company's transparency, commitment to community engagement, and environmental responsibility. Initially skeptical, I came to understand through these partnerships how solar and battery storage projects can deliver long-term value to communities, landowners, and surrounding areas. These projects foster cooperation when relationships are built from the ground up, creating reliable, long-term income streams for families, helping preserve farms, and sustaining local economies.

Solar energy, being clean, quiet, and regenerative, allows land to rest while contributing to statewide reductions in emissions and improved air quality. Additionally, battery storage enhances grid reliability, reduces outages, and ensures energy availability during peak demand, a growing concern as our dependence on electricity increases. These projects also generate local tax revenue, fund infrastructure improvements, and often provide broader benefits, such as equipping small departments of local first responders with much-needed new equipment and lifesaving tools, all without overburdening local services.

The inclusion of 20 new renewable generation projects and 156 energy storage projects, contributing over 3.8 gigawatts of additional capacity, reflects NYPA's genuine commitment to action and progress. I urge all relevant decision-makers to maintain this momentum to power New York's future. The public's support is not merely symbolic - it is a mandate. As a proud New Yorker, I encourage you to seize this opportunity to invest in projects that will make our energy system cleaner, more reliable, and more equitable for generations to come.

Signed,

Michael Henry

**Dennis Higgins
592 County Highway 5, Otego, NY 13825
607-988-9647**

Should NYPA increase planned solar and wind installations?

NYPA's draft plan details expanded investment in solar and wind resources, as well as the storage and transmission needed to support renewable buildout. Rather than critiquing the individual details of this draft, I will examine whether any energy plan focused on low-capacity factor, land-hungry assets will prove reliable or affordable. We must also ask whether requiring the upstate region to forfeit land in what will prove a failed effort to power metro New York passes the 'environmental justice' litmus test.

Currently, New York's energy plan requires the sacrifice of up to a million acres of forest and farmland for intermittent resources drafters of the Scoping Plan believed would power downstate.¹ Issues of local consent, property rights, fair tax compensation, and environmental safety have been sidelined by ORES and RAPID. Home-rule is denied and SEQRA is ignored to site solar and wind facilities in rural communities.² Of note, these resources, mostly, produce nothing at all. Wind in NYS has a capacity factor under 25%, effectively generating energy less than one day in four. Solar capacity factor is under 13%, providing electricity one hour out of seven. Ironically, upstate has a 90% carbon-free grid while downstate has a 90% fossil-fuel powered grid. The costs and constraints for needed transmission and storage suggest curtailment will continue for years. Intermittency and low capacity factors mean dispatchable backup will be needed forever.

The high costs, low reliability, and questionable carbon-cutting efficacy of solar and wind power have prompted criticism from NERC, Sweden, Harvard, and NYISO among many others. Unpredictable generation has serious impacts on the capacity market unlikely to be mitigated with storage or export. These are discussed below.

¹ <https://climate.ny.gov/resources/scoping-plan/>

² <https://nysba.org/preempting-local-zoning-codes-fuels-opposition-to-renewable-energy-in-new-york/>

Contents

I: NERC on the NY plan

II: Neither academic nor empirical evidence indicate the state plan will succeed

III: NERC warning -- IBRs undermine grid reliability

IV: Capacity markets hammered by intermittent resources increasing energy costs and undermining reliability

V: Intermittent resources will not prove economical or reliable according to Sweden and others

VI: NYISO has repeatedly warned of reliability issues

Appendix

Chart notes

- I. NYS's energy plan assumes markets will be available for our excess wind and solar energy to suggest fiscal efficacy but neighbor states must provide energy to ensure reliability. NERC has issued warnings about these assumptions**

The North American Energy Reliability Corporation (NERC) lists five risks to the bulk power system. Risk #1 is a bad energy plan and risk #2 are changes made to the grid to implement a bad plan.³ A renewable-based grid will need a whole new transmission structure – bigger than the current grid -- which someone will have to pay for. It will need full-capacity dispatchable backup and expensive BESS. Any wind, solar, and BESS resources installed today will need replacement by 2050. New York may not be able to shutter significant fossil-fuel power plants but may, rather, be obliged to build more. California – two decades ahead of New York in pursuit of a grid powered by solar and wind -- has extended the operations of three gas power plants at least until 2026 to maintain reliability and affordable rates.⁴ California will add another gigawatt (GW) of gas power this year.⁵

NERC warns that an energy policy that bases fiscal efficacy on sales of excess solar or wind but requires energy imports for reliability is a bad plan.

Capability for imports does not necessarily mean that energy from imports is available and these limitations should be included in an energy reliability assessment. The availability of imports is dependent on energy issues or demand requirements in external regions. Coordinated studies would show the assumptions of imports and

3

https://www.nerc.com/comm/RISC/Related%20Files%20DL/RISC_ERO_Priorities_Report_2023_Board_Approved_Aug_17_2023.pdf

⁴ <https://www.energyindepth.org/to-meet-demand-california-delays-closure-of-natural-gas-plants-again/>

⁵ <https://www.powermag.com/hundreds-of-new-gas-fired-power-units-planned-as-u-s-gas-output-soars/>

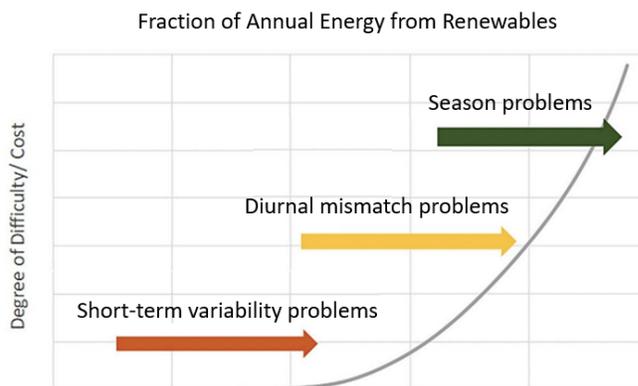
exports at adjoining interfaces, ensuring that energy is available to support exports to an area that is depending on the corresponding imports, and is not counted in multiple energy reliability assessments. Conflicting assumptions could leave operators unexpectedly energy deficient.⁶

II. Neither academic studies nor empirical evidence support New York’s renewable push

Academic studies as well as empirical evidence do not support claims that wind and solar will prove economical or reliable. Recent studies suggest wind may raise surface temperatures offsetting any carbon-cutting advantage in the technology.

Below, a National Renewable Energy Laboratory (NREL) chart shows the asymptotic costs of a system as penetration of renewables increases. Expensive BESS can somewhat solve the “short-term” variability of intermittent resource generation. But there is no day-night or seasonal solution.

Challenges of a Renewable Electric System



Harvard has completed several studies questioning the carbon-cutting value of wind power. “In agreement with observations and prior model-based analyses, US wind power will likely cause non-negligible climate impacts.”⁷ In brief, Harvard found that wind turbines might increase warming.⁸

“In two papers ... Harvard University researchers find that the transition to wind or solar power in the U.S. would require five to 20 times more land than previously thought, and, if such large-

⁶ https://www.nerc.com/comm/RSTC_Reliability_Guidelines/CLEAN_ERATF_Vol_1_WhitePaper_17MAY2023.pdf

⁷ <https://www.cell.com/action/showPdf?pii=S2542-4351%2818%2930446-X>

⁸ <https://www.americanexperiment.org/harvard-study-finds-wind-turbines-will-cause-more-warming-in-minnesota-than-emissions-reductions-would-avert/>

scale wind farms were built, would warm average surface temperatures over the continental U.S. by 0.24 degrees Celsius.”⁹

“For wind, we found that the average power density — meaning the rate of energy generation divided by the encompassing area of the wind plant — was up to 100 times lower than estimates by some leading energy experts,” said Miller, who is the first author of both papers. Noting that some of New York’s wind resources will require 100 square miles: “Most of these estimates failed to consider the turbine-atmosphere interaction. For an isolated wind turbine, interactions are not important at all, but once the wind farms are more than five to 10 kilometers deep, these interactions have a major impact on the power density.”

In pursuit of an unproven plan, one that may not reliably affordably power the state, a plan which has never worked anywhere, solar and wind buildout proposed by E3-NYSERDA’s Scenario Three¹⁰ (55GW solar and 10GW onshore wind) would gobble up a million acres of farmland and forest.

III. NERC has repeatedly warned that IBRs can undermine grid reliability

It is easy to find instances demonstrating that the increased penetration of inverter-based resources undermines grid reliability. Around noon on a sunny day this past April, much of Spain, Portugal, and even a bit of France went dark, as if someone had switched off the lights. Solar and wind generate direct-current (DC) electricity. But electric grids run on alternating current (AC). Inverters convert power from DC to AC and attempt to regulate voltage and frequency on the grid. Variations in solar or wind output, load imbalances, power demand surges, or frequency fluctuations may cause inverters to disconnect from the grid.

The North American Energy Reliability Corporation (NERC) issued its highest alert to transmission owners, planners, and generator operators, urging an investigation into how deployed IBRs will respond to grid disturbances.

Since 2016, NERC has analyzed numerous major events totaling more than 15,000 MW of unexpected generation reduction. These major events were not predicted through current planning processes. Furthermore, NERC studies were not able to replicate the system and resource behavior that occurred during the events, indicating systemic deficiencies in industry’s ability to accurately represent the performance of IBRs and study the effects of IBR on the bulk power system (BPS).¹¹

NERC’s alert references almost a decade of inverter performance failures. IBRs should continue to operate through a power-line fault or power-plant shutdown but current inverter settings instead may trigger a complete shutdown. As solar and wind resources supply a larger share of electricity, improper inverter settings increasingly risk cascading failures. But those settings may be locked behind manufacturer-issued passwords. Many deployed inverters come from

⁹ <https://news.harvard.edu/gazette/story/2018/10/large-scale-wind-power-has-its-down-side/>

¹⁰ <https://www.ethree.com/e3-develops-decarbonization-pathways-to-meet-new-yorks-emissions-targets/>

¹¹ Ibid NERC Alert on IBR performance [https://www.nerc.com/pa/rrm/bpsa/Alerts DL/Level 3 Alert Essential Actions IBR Performance and Modeling.pdf](https://www.nerc.com/pa/rrm/bpsa/Alerts%20DL/Level%203%20Alert%20Essential%20Actions%20IBR%20Performance%20and%20Modeling.pdf)

manufacturers no longer in business, posing a further challenge in reconfiguring settings. Consequently, it may be impossible to predict how IBRs will respond to fluctuations in voltage or frequency.

What happened in Spain was not the first such failure. In Odessa, Texas, in 2021 a combined-cycle power plant went offline, triggering shutdowns of more than one gigawatt of solar generation. Inverters were operating with settings from a decade earlier. However, in Texas, 56% of its electricity came from traditional synchronous generation and a major outage was avoided. At the time of Spain's event, the grid was powered over 70% by solar: a chain reaction of disconnects occurred, blacking out the Iberian Peninsula. This represents a significant alert about New York's own 70-by-30 renewable energy target.

Hydro, nuclear, and fossil-fuel power plants have big spinning generators and do not need inverters. A constant speed produces alternating current (AC) at a controlled frequency. Slight modifications in rotating speed enable generators to adjust to voltage or frequency changes.

Spinning generators have lots of inertia which enables them to power through load changes. Solar and wind resources have no inertia. A synchronous condenser, which looks very much like a rotating generator, uses energy from the grid to keep spinning. As noted in a recent report from Sweden,

Synchronous generators in hydro and nuclear power plants, due to their large rotating mass, are proactive, i.e., prevent disturbances from occurring. In contrast, “synthetic” inertia, which is often promoted as a solution for wind power, is reactive and must constantly correct disturbances that have already occurred. This adds both complexity and cost to the system. To assist wind power, large rotary converters are also installed to stabilize the grid and manage reactive power. They basically act as synchronous generators but without producing any electricity; instead, they consume electricity and incur an additional cost.¹²

Synchronous condensers add inertia to a grid powered by intermittent resources. Their job in averting grid failure is to supply voltage for a very brief period. If a solution to the fluctuations in voltage or frequency can be determined quickly enough—that is, in a matter of seconds -- condensers might help to keep the lights on. Clearly, they do not guarantee the grid won't go down.

IV. Solar and wind undermine capacity markets and so, directly and indirectly, threaten reliability. As California has discovered, the increased need for peaker plants means you keep burning lots of gas

Renewables will impact capacity markets in terms of displacement, costs, and prices, ultimately threatening reliability and affordability.

In comparison to conventional fossil-fired generation, renewables are likely

¹² Swedish-policy-institute-Electricity-at-Any-Price-upd.-250613.pdf

to have a lower running cost. Consequently, renewable generators can often bid much lower than conventional generation. This will lead to renewable generation being dispatched ahead of conventional plants. Thus, renewable generation displaces conventional generation in bid-based markets. This displacement lowers the capacity factor of conventional generators and reduces the time conventional generators are selling in the market. This reduced output reduces energy revenues to conventional generators. Second, more intermittent renewables require greater flexibility on the part of all generation on the system... Significant demands for flexible output, including more starts/stops per day as well as cycling more often from minimum to maximum output, will likely increase the wear and tear on conventional generators and lead to higher operations and maintenance (O&M) costs and the need to schedule more frequent maintenance outages... Conventional generation will be operating less often as well as having to operate in a manner that increases operating costs. These factors work to reduce the net energy revenue earned by conventional generators. Third, there is an additional impact of renewable generation on energy prices. In bid-based markets, prices are set by the running costs of the marginal plants. Because renewable generators can have low running costs, prices can be quite low in markets where a renewable generator is marginal. Also, social policies to promote renewable generation often provide non-market incentives that influence market outcomes. For example, a production tax credit can produce positive net revenues to a generator even with negative market revenues. Consequently, renewable generators can be willing to pay other market participants to produce, resulting in negative prices for the entire electricity market. As renewable generation penetration increases, the likelihood that such generation will be on the margin is greater, placing downward pressure on energy market prices. However, conventional generators will still be needed to provide flexibility to address renewable variability.¹³

Note—this doesn't mean rate payers get a break. We already see transmission buildout, BESS, and high gas prices impacting rates. Loss of reliability means increased cost due to outages as well. Examined empirically, California, with twice the solar capacity factor of New York and the largest li-ion battery in the world, has the second highest electricity costs in the US – behind Hawaii.¹⁴ Germany's decarbonization effort has come to rely heavily on Russian gas, new coal plants, and nuclear electricity imports from France. Thirty years into its Energiewende¹⁵ effort, Germany has the second highest energy costs in the EU¹⁶. On an ironic note, we get blasts suggesting that Denmark, with the highest energy prices in Europe, has its trains running on solar power.¹⁷

Lower reliability reduces options.

¹³ International Association for Energy Economics, "Renewable Generation and Capacity Markets," Peter H. Griffes

¹⁴ <https://www.capradio.org/articles/2025/01/09/californians-pay-second-highest-electricity-rates-in-the-country-according-to-a-new-report/>

¹⁵ <https://hir.harvard.edu/germanys-energy-crisis-europes-leading-economy-is-falling-behind/>

¹⁶ <https://worldpopulationreview.com/country-rankings/cost-of-electricity-by-country>

¹⁷ <https://www.pveurope.eu/solar-parks/denmark-solar-power-danish-state-railways>

Fast ramping peaker plants are typically used to back up solar and wind. A consequence here is combustion: Combined cycle plants have a 60% capacity factor but peakers may only have a 30%-35% CF, so as more solar and wind are added, more peaker use means that little or no reduction in fossil fuels occurs.

Electricity is traded on wholesale markets like oil and gas. But fossil fuels can be stored in tanks until needed. The storage capacity of batteries will never catch up to the excess production from overbuilt solar and wind. Note that in E3-NYSERDA's Scenario Three¹⁸, 55 GW of solar, 10 GW of onshore wind, and 17 GW offshore wind, are proposed along with up to 170 GWh of storage. This would be storage hundreds of times larger than the largest battery on earth, currently at Moss Landing, CA. At \$500M/GWh this would cost \$100B and provide storage for three hours of excess production. NYC currently uses over 200GWh per day, so we would not be able to keep the lights on there for 24 hours.

...the ideal grid is built on a solid foundation of cheap baseload power, supplemented by highly dispatchable sources to manage fluctuations in demand. Second, a grid composed solely of solar, wind, and batteries is preposterous on its face—the volume of batteries required to provide baseload power for days or weeks at a time borders on the absurd. This is why no such system has ever been piloted at a reasonable scale: the moment it is, the flaws would become immediately and fatally obvious.¹⁹

If energy from solar or wind resources can't be stored, energy must be dumped, or prices may drop below zero with producers paying consumers to take the surplus energy. As NY tries to reduce carbon emissions with renewable generation, power supplies become more volatile. Electricity production from wind turbines surges and slumps in the space of a few hours. And over-built solar makes oversupply a big problem during daylight hours, particularly in the summer when generation peaks. (In the next section, the California duck curve is discussed.)

The introduction of intermittent renewable generation into bid-based restructured markets, especially as these resources achieve higher penetrations, can have a profound impact on the energy revenues to conventional generation, and consequently increase the necessity of capacity payments. As intermittent renewable generation penetration increases in restructured markets, there needs to be a greater reliance on capacity market compensation to ensure viability of conventional generation, needed to maintain reliability.²⁰

While overbuilt capacity has a negative impact on the energy market, it does not ensure reliable electricity.

Amidst the push for more low-carbon energy, we see the demolishing of one of the pillars of electric grids: that of a careful balancing between supply and demand. This is not just a short-term affair. It also affects the construction of new power

¹⁸ <https://www.ethree.com/e3-develops-decarbonization-pathways-to-meet-new-yorks-emissions-targets/>

¹⁹ <https://newsletter.doomberg.com/p/the-exception-that-proves-the-rule-7fb>

²⁰ <https://www.iaee.org/en/publications/newsletterdl.aspx>

plants, investments in transmission capacity, and so on. The problem with having too much capacity is that it effectively destroys the electricity market, as suppliers need to make a profit to sustain and build generators and invest in transmission capacity. This is now the problem that Germany finds itself struggling with due to an overcapacity of variable renewable power sources (VRE) like solar and wind. One suggested solution is to add more transmission capacity and more grid-level storage, but these scale poorly and are an economically dubious solution.

The New York State capacity market faces challenges with renewable energy, particularly due to negative prices. These negative prices are observed more frequently during spring and autumn, driven by the increasing capacity of photovoltaic power plants. The Short-Term Electricity Market Organizer (OKTE) reported 91 hours of negative prices in 2023, with the number exceeding 288 hours in 2024. This trend is a result of insufficient energy planning and the need to increase storage capacities to effectively utilize energy surpluses. The energy crisis of 2022 further accelerated this issue, leading to an increase in negative prices due to insufficient demand during surpluses.²¹

V. Sweden, and others, do not see intermittent resources reducing costs or adding reliability

Costs do not fall but rather, rise, as intermittent resources are added to the grid.

Countries with a high share of solar and wind power have major system problems and are partly forced to ensure the functioning of the system by means of fossil fuel power plants. To manage the intermittency of wind and solar power, there must be other power sources that can be switched on and off whenever needed to balance supply and demand. The more wind and solar power in the system, the more capacity must be available in balancing power plants to replace solar and wind power when the sun is not shining and/or there is insufficient or no wind. The capacity utilization of this balancing power will be lower the more wind and solar power is installed, which means that its revenue will be lower. To compensate for this fact, either the balancing power prices have to be higher, or the owners of the balancing power have to get paid for their availability. Therefore, even if intermittent power were cheaper than traditional baseload power, it will not only lead to more volatile prices but also to higher electricity prices overall. Average household electricity prices have therefore increased in countries with high shares of wind and solar power.²²

²¹ <https://www.habitatmag.com/Publication-Content/Green-Ideas/2025/April-2025/new-york-renewable-energy-challenges>

²² See e.g. Hannesson, Rögnvaldur (2025). "An electricity market model with intermittent power". *Energies* vol. 18, no. 6, p. 1435. Also Karlsson, Svenolof (2025), "Enormous costs for renewables in Germany". Second Opinion, January 2. The installed capacity of solar power in Germany now exceeds the maximum power requirement by a wide margin.

Sweden provides a cautionary tale of what reliance on, and accommodations for, wind power can mean. In New York, as in Sweden, hydro and nuclear are already fully “booked.” If California and Germany have not provided sufficient reason to eschew an intermittent-powered grid, maybe Sweden’s example will provide a further admonition.

With continued expansion of wind power in Sweden, the country cannot rely on hydropower as balancing power; hydropower is already largely more or less fully booked as balancing and regulating power. From 2020 to 2022, balancing costs increased by more than SEK 5 billion as wind power increased by 4.6 billion kWh. Although not all of the increase is linked to wind power, it is the main cause, and it corresponds to a balancing cost on the margin that exceeds the value of the LCOE adopted by the Council.²³

In fact, over a megawatt of dispatchable generation is necessary for every megawatt of renewable added to the grid:

Controlling for country fixed effects and the rich dynamics of RE capacity, we show that, all other things equal, a 1% percent increase in the share of fast reacting fossil technologies is associated with a 0.88% percent increase in renewable generation capacity in the long term.²⁴

To put this in other words, a 340 MW project like Alle-Catt wind²⁵ will need almost 400 MW of dispatchable backup. We will be building, not shutting down, fossil-fuel power plants. California and Germany found that dependence on solar and wind meant building more gas and coal power plants and relying, increasingly, on energy imports.

A careful consideration of the relationship between renewable capacity and other generation technologies, and especially fast-reacting fossil-based electricity generation, unveils two significant shortcomings of existing empirical and theoretical analyses. First, it highlights that the trade-off between renewable deployment and security of supply is exacerbated as renewable penetration increases. Second, it suggests that unless cheap storage options become widely available in the immediate future, the penetration of renewable energy will increase system costs, as a significant amount of capital-intensive and under-utilized back-up capacity will have to be maintained. Overlooking these two issues leads to an underestimation of the costs of the energy transition. This is particularly troublesome considering that higher renewable penetration rates will further increase system variability and hence require a parallel expansion of back-up resources (NYISO, 2010 and REW 2011).²⁶

Beyond the solar panel or turbine price tag, solar and wind need battery backup. A recent NREL report titled “ Cost Projections for Utility-Scale battery Storage:2023 Update” by Wesley Cole

²³ Ibid Swedish-policy-institute-Electricity-at-Any-Price-upd.-250613.pdf

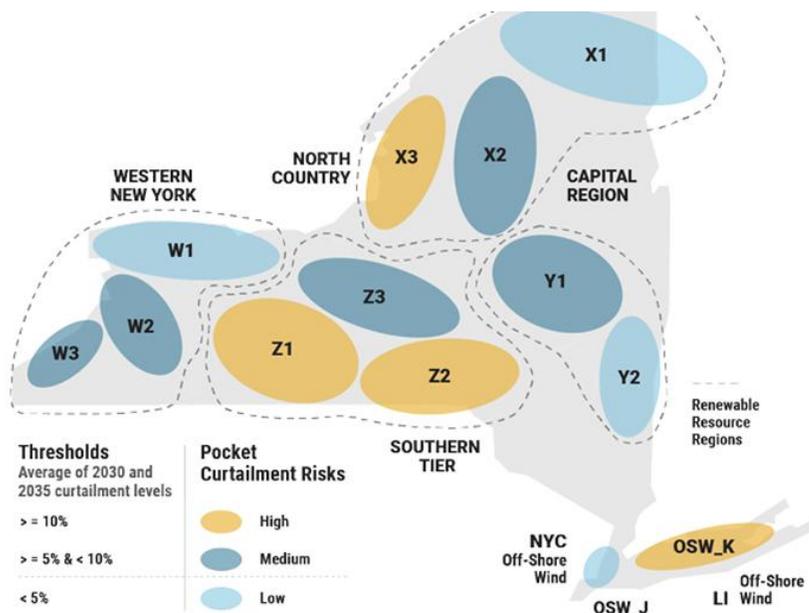
²⁴ https://www.nber.org/system/files/working_papers/w22454/w22454.pdf

²⁵ <https://allecattwind.invenenergy.com/>

²⁶ https://www.nber.org/system/files/working_papers/w22454/w22454.pdf

and Akash Karmakar puts costs at \$500/KWh.²⁷ With transmission constraints, as detailed by NYISO next page, there will be times that Alle-Catt produces at 100% but the energy must be stored: For just one hour, 340,000 KWh of storage at \$500 per KWh would cost about \$170,000,000 dollars.

Low-capacity-factor solar and wind require overbuilding resulting in a bloated grid. As noted elsewhere, New York’s plan will need about a million acres of state farmland and forest. Remote resources must have full nameplate transmission to a three-phase line or substation. RAPID allows developers to take land by eminent domain to run poles and wire. Solar and wind need a whole new fiscal model: We must pretend that we can sell our overbuilt solar in the summer and import energy the rest of the year. As noted earlier, NERC tells us that a grid whose reliability hinges on imported energy will likely mean lights out for residents in summer and perhaps in winter, too. California dumped 3.4 terawatt hours of renewable generation last year²⁸ and still experiences blackouts when expected imports don’t arrive. The NYISO, in its 20-year outlook, indicates that statewide transmission constraints (across Finger Lakes, LI, and Southern Tier, see brown pockets below) could last for years:²⁹



Wind curtailments doubled between 2021 and 2023.³⁰ Wind and solar generation do not track demand – hence California’s “duck curve:” a tragic and worsening picture of money wasted on intermittent resources, dumped energy, and the 2 GW of gas backup needed to fill the energy shortfall.³¹

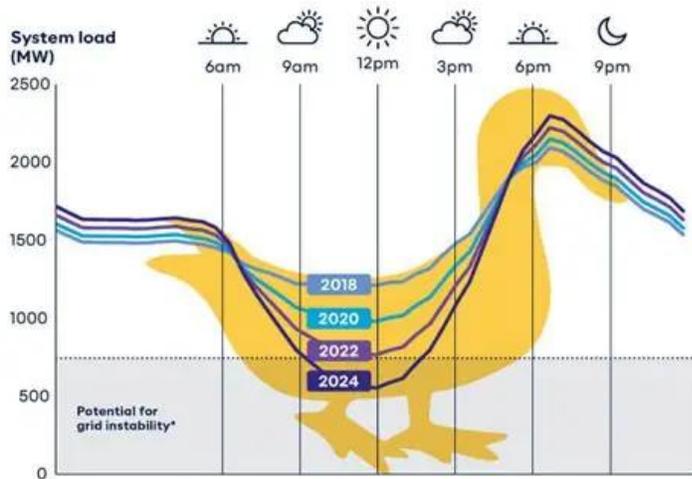
²⁷ <https://research-hub.nrel.gov/en/publications/cost-projections-for-utility-scale-battery-storage-2023-update>

²⁸ <https://www.canarymedia.com/articles/solar/california-waste-clean-energy-curtailments>

²⁹ <https://www.nyiso.com/documents/20142/33384099/2021-2040-Outlook-Report.pdf>

³⁰ <https://www.nyiso.com/documents/20142/2223020/2024-Power-Trends.pdf> p. 47

³¹ Images of CA duck curve widely available, this one from <https://www.barclaypearce.com.au/blog/absi-duttons-energy-plan-is-a-nuclear-duck>



As renewable assets are added, but transmission, storage, export, and demand do not align with generation, this will get worse. We may find ourselves dumping solar or wind energy generated in central or western New York – or off Long Island -- even as the metro region experiences outages. And we will want synchronous condensers, bumping initial system costs by 10%.

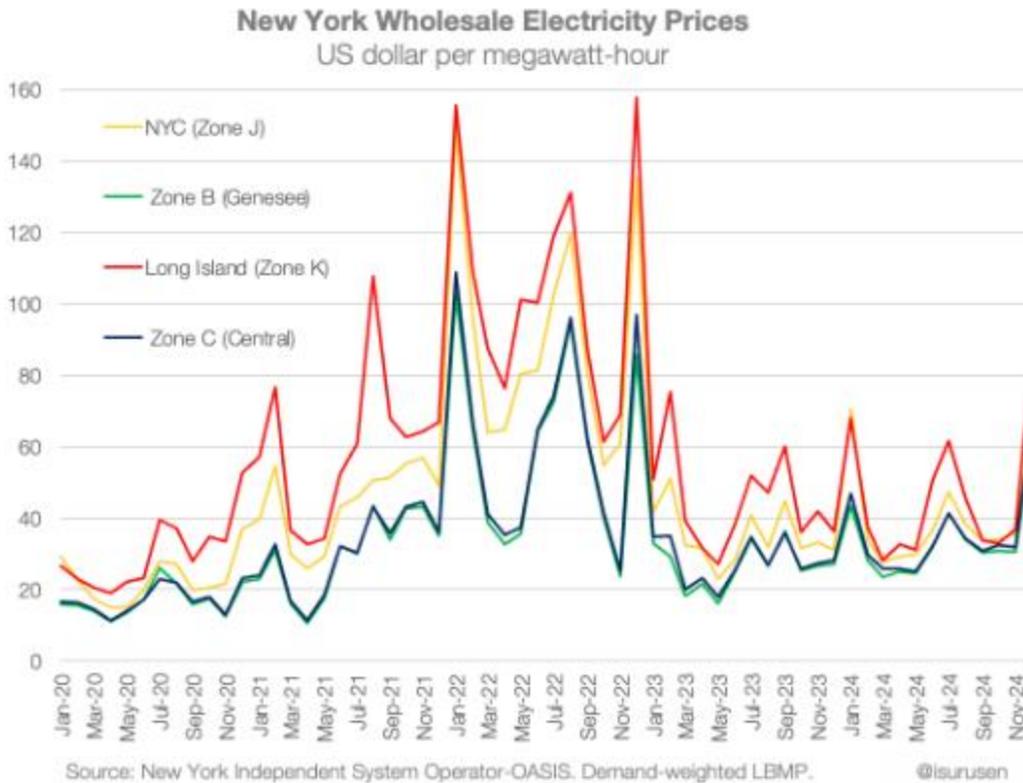
1.2 million rate payers are already in arrears.³² Electric bills will continue to rise as the state overbuilds solar and wind resources and adds synchronous condensers to supply inertia; and installs thousands of miles of transmission for resources which, mostly, generate nothing at all. We'll pay for electricity to keep condensers spinning but will continue to experience blackouts as reliability declines.

V. The grid operator, NYISO, has repeatedly warned of reliability issues

Starting in 2023, the New York State Independent System Operator (NYISO), has warned of about a ½ gigawatt energy shortfall in metro NY this summer (2025) in normal weather.³³ Sure enough, Queens went black this July. Here's a picture of what shutting down 25% of NYC's energy – baseload carbon-free nuclear – as EU faced an energy crunch, did to fossil-fuel prices downstate:

³² <https://www.wnypapers.com/news/article/current/2022/07/18/151651/dinapoli-number-of-new-yorkers-behind-on-utility-bills-soared-during-pandemic>

³³ <https://www.tdworld.com/transmission-reliability/article/21269640/nyiso-study-finds-reliability-margin-deficit-of-446-mw-for-new-york-by-summer-2025>

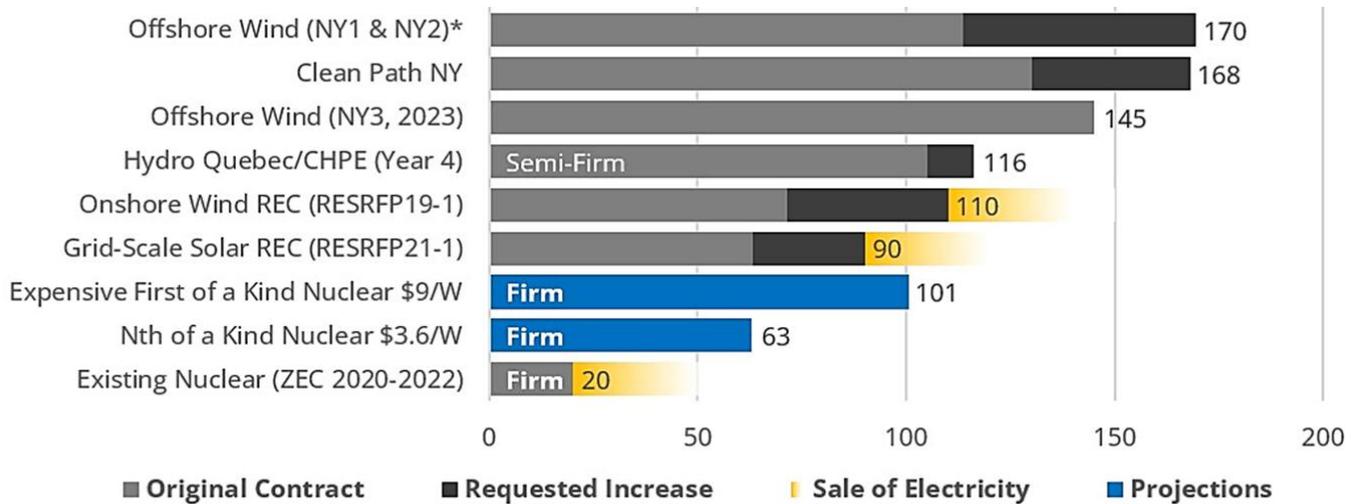


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NYISO recently released its annual Power Trends report. In 2024, the state used about 131 terawatt-hours of electricity. Fossil fuels generated about half. Although hydro and nuclear resources represent about 20% of installed capacity, they produced 42% of the state’s energy. The state’s 3.3 gigawatts of nuclear generated 27.5 terawatt-hours – representing a capacity factor almost exactly 95% of nameplate. On the flip side, solar and wind produced about 8% of state energy in 2024.

In this context, it is worth pricing New York’s energy options:

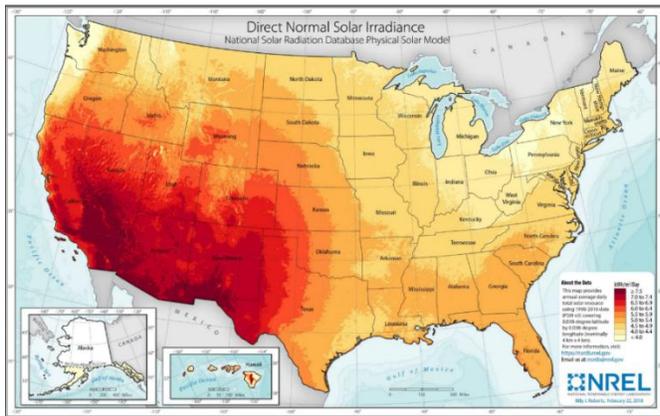
³⁴ <https://mis.nyiso.com/public/>



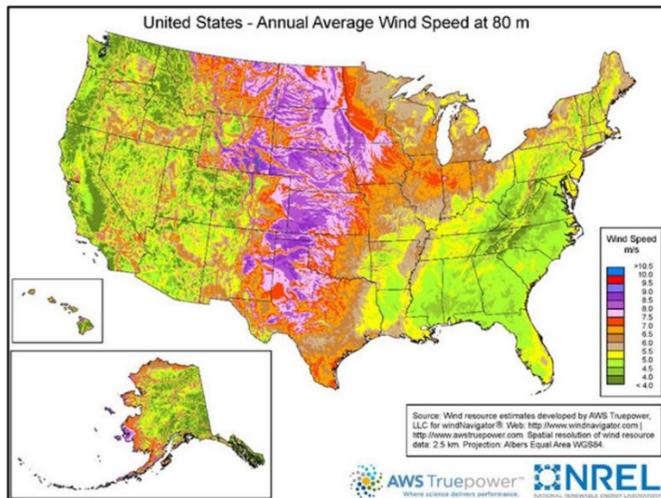
Sources: DOE Advanced Nuclear Liftoff (with ITC, 2023); Jenkins; Hydro Quebec & CPNY contract prices; NYISERDA 2022 Offshore Wind Solicitation; DPS Case 15-E-0302 comments by DPS, MI & MUEA, CHPE & HQ, CPNY. * Blended Empire Wind 1 & 2, Beacon Wind, Sunrise Wind

See Appendix for notes. We see that existing nuclear, Nth of a kind nuclear, and even first of a kind nuclear, are cheaper options than New York is currently prioritizing.

According to NYISO reporting, New York has a wind capacity factor of about 22%. Solar capacity factor in NYS is under 13%. Solar and wind are resources which generate a small fraction of nameplate, not necessarily when it is needed. As the chart from NREL indicates, solar in NYS is about the same as in south-west Alaska:



NREL shows that wind capacity factor in NYS is half of what it is in Nebraska.



According to Power Trends, since 2019, over four gigawatts of dispatchable high-capacity-factor resources were decommissioned while a little more than two GW of intermittent resources were added. NYISO is concerned that policy mandates undermine reliability.

As traditional fossil-fueled generation deactivates in response to decarbonization goals and tighter emissions regulations, reliability margins on the grid are eroding. Further, the remaining fossil-fueled generation fleet, which provides many of the essential reliability services to the grid, is increasingly made up of aging resources, raising further concerns about grid reliability. Strong reliability margins enable the grid to meet peak demand, respond to sudden disturbances, and avoid outages. They also support the grid’s ability to respond to risks associated with extreme weather conditions. As these margins narrow, consumers face greater risk of outages if the resources needed for reliability are unavailable due to policy mandates or failures associated with aging equipment.³⁵

The “reserve margin,” meant to buffer us from outages, has been halved, dropping from over 4,000 MW (2019) to about 2,000 MW (2024). Have we cut fossil-fuel use? No. Since 2019, fossil-fuel use has risen dramatically. Fossil fuels generated 52,300 GWh in 2019. This climbed to 67,298 GWh in 2024, almost a 30% increase. Against this background, NYISO expects power demand to more than double in the next 20 years from about 30,000 MW currently, to over 60,000 MW in 2045.

High-tech manufacturing is expanding in New York. Several projects are underway or on the horizon, promising to create thousands of jobs for New Yorkers while also highlighting the need for large investments in energy infrastructure. The challenge for policymakers and industry stakeholders is how to continue to power our society and economy in a way that is reliable, affordable, and sustainable — even while

³⁵ <https://www.nyiso.com/documents/20142/2223020/2025-Power-Trends.pdf/>

much of the clean generation technologies mandated by state policies are weather-dependent and thus variable in nature.³⁶

The Iroquois ExC project was approved by the DEC. That gas is needed to fuel the Cricket Valley (CVE) power plant – one of two gas plants built to replace Indian Point, enabling CVE to run at capacity. We see Williams pursuing NESE³⁷. Even the Constitution pipelines’ discussion has resurfaced as grid reliability plummets and gas demand grows. Avangrid, EXXON, Dominion – big fossil-fuel corporations – are heavily invested in solar and wind. What do gas company executives know that New York’s energy planners don’t get?

New York is a “tale of two grids:” 90% of upstate energy is zero emission, running on nuclear and hydro while downstate runs on about 90% fossil-fuels. The Comptroller noted that a million ratepayers are currently in arrears but confronting increasing costs as the state pursues an energy plan focused on renewable buildout requiring hundreds – perhaps thousands – of miles of new transmission. The Business Council wrote Governor Hochul, “While New York can and should take steps to reduce greenhouse gas (GHG) emissions, its goal should be to present a model path forward, not a cautionary tale of unaffordable costs, harmful economic disruptions, and threats to future economic growth.”³⁸ The Public Service Commission admitted in its biennial report that on our current trajectory we will not meet the upcoming (70%-by-2030) decarbonization target and, as the Business Council noted, this puts all the CLCPA goals in jeopardy. Fortunately, the 2040 goal in CLCPA is a carbon-free grid with no renewable quota.

Dozens of countries, and not a few states, realize we will need nuclear power. “Governor Hochul [directed] the New York Power Authority (NYPA), in coordination with the Department of Public Service (DPS), to develop and construct at least one new zero-emission [one gigawatt] advanced nuclear power generation facility in Upstate New York, either alone or in partnership with interested private entities.”³⁹ While this is a move in the right direction, it represents a tiny fraction of the investment in nuclear the state must undertake. An effort to replace today’s fossil-fuel capacity and, in 20 years, to provide the 60 gigawatts NYISO believes will be needed, requires a fundamental change in New York’s thinking about energy.

NYPA should rethink its emphasis on intermittent buildout. Nuclear generators would require a tiny fraction of the land needed for wind and solar, and can operate on the existing grid. Nuclear installations would provide thousands of high-paying jobs, and emission-free baseload energy at a 95% capacity factor. According to Oxford nuclear is as safe as solar or wind.⁴⁰ According to the UNECE, nuclear has the lowest lifecycle environmental impact of any generating source.⁴¹

³⁶ Ibid Power Trends

³⁷ <https://www.ogj.com/pipelines-transportation/pipelines/news/55308086/williams-reaches-commercial-agreements-for-revived-nese-gas-pipeline>

³⁸ <https://www.bcnys.org/sites/default/files/2024-07/Final%20CLCPA%20%20sign%20on%20letter%20.pdf>

³⁹ <https://www.governor.ny.gov/news/governor-hochul-directs-new-york-power-authority-develop-zero-emission-advanced-nuclear-energy>

⁴⁰ <https://ourworldindata.org/nuclear-energy>

⁴¹ <https://earth.org/nuclear-energy-carbon-emissions-lowest-among-electricity-sources-un-reports/>

An efficient, fiscally sound grid would not rely on intermittent resources and batteries, while full capacity carbon-free baseload backup sat idle. Existing hydro and new nuclear as the backbone of the grid, along with a modest solar and wind component, would prove economical and reliable. These might even enable New York to meet the “100%-carbon-free grid by 2040” state target. The state should reject large-scale wind projects and begin building a carbon-free grid powered by hydro and nuclear.

Appendix

Notes for cost chart

1. Onshore solar / wind RECs are Contract for Difference contracts, meaning NYSERDA pays the full price minus market price (yellow, market driven). The nuclear plants receive ZECs on top of their realized price (yellow, market driven). Not sure how NYSERDA recovers the market price from offshore contracts.
2. This doesn't account for the 45U tax credit that existing nuclear plants will get since the passage of the IRA. I'm not sure exactly where this will settle, but expectations are that about 1/2 of New York's ZEC burden will shift to the Feds. See excerpts from this Morgan Lewis write up below.
3. CPNY contract collapsed at that price. I believe they are trying to revive it through NYPA.
4. Offshore wind (NY1&NY2) shows a blended price, but only one project went ahead after the denial of the rate increase request. And even that's dead in the water with Trump.
5. All RECs, ZECs, and NYSERDA fixed-bid contracts are tacked on to electric bills without the volume discounts. So, they are progressive in the sense that large electricity consumers don't get volume discounts.

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August 14, 2024

Comments on New York Power Authority's Renewables Conferral on behalf of Gary A. Abraham, Esq.; Benjamin E. Wisniewski, Esq.; and Ginger D. Schroder, Esq.

The undersigned are attorneys who, among us, have over 30 years of experience representing municipalities and community groups in siting or permitting large-scale renewable energy projects under SEQRA, and before the PSL Article 10 Siting Board and the state Office of Renewable Energy Siting (ORES). Please accept the following comments solicited by NYPA regarding the following questions:

1. Please share your thoughts on the State's progress toward CLCPA goals.
2. Please share your thoughts on how NYPA can or should support CLCPA.
3. Please share your thoughts on what NYPA is already doing to support CLCPA.
4. Do you have anything else you would like to share for the record?

* * *

1. THE STATE'S PROGRESS TOWARDS CLCPA GOALS

New York State has not made meaningful progress towards CLCPA goals. This is well documented in credible public agency reports. The State's irrational pursuit of excessive wind and solar energy generation has led to disastrous environmental consequences, public unrest, and only increased its reliance on fossil fuels. Continued investment in wind and solar to the exclusion of reliable baseload, load-following and dispatchable low-carbon sources (such as nuclear, hydropower, geo-thermal) will not change this trend. An all renewables electrical grid is inherently unstable, cannot provide reliable power and will substantially increase the cost of power for both taxpayers and ratepayers.

Recent reports by the state Department of Public Service (DPS), the State Comptroller, and NYISO acknowledge that the 2030 CLCPA goal to achieve 70% of New York's grid-provided electricity with renewable energy cannot be met.¹ Based on these reports, over 50 business, energy and labor organizations have called on the State to undertake "a realistic assessment of the GHG [greenhouse gas]

1 NYS Dep't Public Service, "Draft Clean Energy Standard Biennial Review" (July 1, 2024), filed in PSC Case No. 15-E-0302, *Clean Energy Standard*; NYS Comptroller, Report 2022-S4, "Climate Act Goals—Planning, Procurement and Progress Tracking (July 2024), <<https://www.osc.ny.gov/state-agencies/audits/2024/07/16/climate-act-goals-planning-procurements-and-progress-tracking>>; NYS Comptroller, "Economic and Policy Insights New York State's Clean Energy Fund" (July 2024), <<https://www.osc.ny.gov/files/reports/pdf/clean-energy-fund.pdf>>; NYISO, "Zero Emissions by 2040 Technical Conference" (December 11-12, 2023) (presentation on currently unavailable "dispatchable emissions-free source" necessary to achieve CLCPA goals), filed in PSC Case No. 15-E-0302.

emission reduction impacts of existing state initiatives”.² The reasons the State cannot achieve the CLCPA goals are structural and indicate that large-scale renewables (wind + solar + batteries) are approaching their maximum ability to contribute to the state’s decarbonization goals. After more than two decades of aggressive incentives, New York currently provides less than seven percent of its electricity from wind, solar and batteries.³ DPS optimistically projects that New York can achieve 45% of its electricity generation with renewables, but most that will be from hydropower.⁴

These recent reports also show that the CLCPA goals are aspirational goals and policy objectives rather than legal mandates. The state Public Service Commission “has not started to address all current and emerging issues that could significantly increase electricity demand and lower projected generation.”⁵ A Scoping Plan to achieve the CLCPA goals has been developed, but no credible fiscal or engineering analysis was ever presented to support the plan. No cost/benefit analysis was performed, and none is planned. As discussed below, the structural obstacles to achieving the CLCPA goals principally with renewable energy cannot be overcome, and they mean that continued efforts to achieve those goals will progressively damage the grid and make energy unaffordable,⁶ with potentially existential consequences for some.⁷

France, Sweden and Ontario managed to decarbonize their grids in two decades while maintaining affordable reliable electricity and growing their economies by utilizing the same resources New York has: hydropower and nuclear power.⁸ The CLCPA’s emphasis on wind⁹, solar and batteries is an outlier,

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- 2 See The Business Council of New York State, “Final CLCPA sign on letter” (July 30, 2024), <<https://www.bcnys.org/news/statement-regarding-clcpa-letter-calling-answers-key-policy-concerns>>.
 - 3 NYISO, *Power Trends 2024*, 49, <<https://www.nyiso.com/power-trends>>.
 - 4 NYS Dep’t Public Service, “Draft Clean Energy Standard Biennial Review”, 56; NYISO, *Power Trends 2024*, 49.
 - 5 NYS Comptroller, “Climate Act Goals—Planning”, 1.
 - 6 For example, in 2018 the lowest-earning 10% of all U.S. households spent 36.3% of their income on energy, according to a U.S. Bureau of Labor Statistics’ Consumer Expenditure Survey. U.S. Bureau of Labor Statistics, “Consumer Expenditures in 2018”, (May 2020), <<https://www.bls.gov/opub/reports/consumer-expenditures/2018/home.htm>>. Transitioning to intermittent resources exacerbates inequity as it results in a significant burden being placed on the most economically challenged households. Rising energy costs, as seen for more than a decade in California, are an inescapable burden upon the poor. R. Bryce, “The High Cost of California Electricity Is Increasing Poverty”, The Foundation for Research on Equal Opportunity (July 2020), <<https://freopp.org/the-high-cost-of-california-electricity-is-increasing-povertyd7bc4021b705>>.
 - 7 A recent report from Cornell University confirms that there will be an energy shortfall of between 59% and 89% in Zones J (New York City) and J (lower Westchester) if the CLCPA is implemented as planned. These two zones contain approximately 60% of New York State’s population. V. Liu, et al., “Heterogeneous Vulnerability of Zero-Carbon Power Grids under Climate-Technological Changes”, *arXiv: Physics and Society* (July 2023) (v2), <<https://doi.org/10.48550/arXiv.2307.15079>>.
 - 8 Indeed, the Province of Ontario is canceling wind projects and embracing an aggressive build-out of nuclear power. Mike Crawley, “Doug Ford government spent \$231M to scrap green energy projects”, *CBC News* (November 19, 2019); Matthew McClearn, “What the death of Ontario’s green energy dream can teach other provinces about the challenges ahead”, *The Globe & Mail* (June 1, 2020). China has 55 nuclear reactors in operation, and 26 nuclear power units under construction. Darrell Proctor, “China Starts Construction of More Reactors as Part of Rapid Nuclear Buildout”, *Power magazine* (July 29, 2024), <<https://www.powermag.com/china-starts-construction-of-more-reactors-as-part-of-rapid-nuclear-buildout/>>.
 - 9 Robert Bryce, a well-known energy commentator, notes that a recent study, published in *Environmental Research Letters* and coauthored by a post-doctoral fellow (Lee Miller) and a physics professor (T. David Keith) at Harvard

followed only by California and Germany, where the program has been a clear failure.

The grid was built for large, centralized generating plants, including nuclear power plants that operate almost around the clock. Adding weather-dependent, unreliable renewables that lack fuel (wind and sunlight) half the time and operate at a fraction of their design capacity requires unprecedented levels of grid management, including fossil-fueled backup power¹⁰ and new local, regional and long-distance transmission capacity. It should be axiomatic that hardening the grid to extreme weather by relying principally on weather-dependent renewables is a technological challenge. Simply changing New York's date for doing so to 2033, is a prescription for repeated failure.

2. HOW NYPA CAN OR SHOULD SUPPORT CLCPA.

NYPA cannot fulfill its mission if it supports CLCPA's focus on intermittent and unreliable renewables—wind and solar. NYPA must lead the way on nuclear, now.

NYPA's mission, to provide inexpensive public power, is obstructed by New York's "two grids" problem. Siting a handful of new nuclear power stations can solve the two grids problem by bringing power generation closest to where it is needed. Siting large-scale renewables only exacerbates the two grids problem, since land and water in the amount needed for wind and solar is scattered throughout New York and far offshore,¹¹ requiring substantial and prohibitively expensive new transmission capacity.¹²

Current climate modeling, as reported by the Intergovernmental Panel on Climate Change and the International Energy Agency, refutes the false premise that climate change is an "existential" threat requiring immediate action without regard to cost benefit analysis. Global average temperatures are likely to increase to between 2 and 3 degrees Centigrade by 2100,¹³ affording NYPA adequate time to

University, demonstrates that wind energy's "Achilles Heel" is its paltry power density. The Harvard University authors found that the average power density—meaning the rate of energy generation divided by the encompassing area of the wind plant—was up to 100 times lower than estimates by some leading energy experts. Miller and Keith concluded that solar panels produce about 10 times more energy per unit of land as wind turbines—a significant finding—but, as Bryce notes, their work deserves attention for two other reasons—it uses real world data, rather than models, to support its conclusions and it conclusively shows that wind energy's power density is far lower than the Department of Energy, IPCC and numerous academics have touted. "The ongoing push for 100-percent renewables, and, in particular, the idea that wind energy is going to be a major contributor to that goal, is not just wrongheaded—it's an energy dead end." Bryce, "Why Wind Power Isn't the Answer" City Journal, Manhattan Institute for Policy Research (January 29, 2019).

10 NYISO has determined that four dual-fuel backup ("peaking") generators in New York City must remain in operation for at least two years beyond their scheduled deactivation date of May 1, 2025, finding that energy storage alternatives are insufficient to keep the lights on. NYISO, "Short-Term Reliability Process Report: 2025 Near-Term Reliability Need", <<https://www.nyiso.com/documents/20142/39103148/2023-Q2-Short-Term-Reliability-Process-Report.pdf>>; *Power Trends 2024*, 20.

11 Offshore wind (which also requires substantial new transmission capacity) is unlikely to obviate the need for new low-emissions generation provided by nuclear power. No offshore renewable energy credits have been generated, and the future of offshore wind in New York is questionable. See NYS Comptroller, "Climate Act Goals", 15.

12 See PSC, CES Modification Order (October 15, 2020), 78 (finding that "absent new transmission capacity, the addition of new upstate renewable developments will fail on its own to increase the penetration of renewable energy consumed in New York City to a level that enables statewide compliance with the 70 by 30 Target.").

13 Intergovernmental Panel on Climate Change (IPCC), Sixth Assessment Report, Vol. WG1, *The Physical Science*

adapt to potential changes while developing an effective strategy for achieving the state's emissions goals with an all-of-the-above strategy, primarily hydro- and nuclear power, with limited support from wind and solar resources in appropriate locations.

NYPA should focus on the CLCPA's technology-neutral zero-emissions electricity 2040 climate goal and the 2050 "net zero" goal for the state economy as a whole. Multiplying the state's nuclear capacity may substantially advance the 2040 and 2050 goals (but cannot contribute to the 2030 goal). A technology-neutral energy policy to reduce emissions will result in less renewables and more nuclear because neither NYPA nor the state's private utilities are able to effectively deliver renewable energy to an existing grid that has been designed and built to operate under the large centralized generating plant model. Indeed, a program to achieve the State's emissions goals primarily with hydro- and nuclear power would make it unnecessary to re-make the grid to accommodate renewables.

NYPA should renew the licenses of its existing operating reactors and plan for the deployment of additional modern nuclear power plants throughout the state. It is the fastest way to decarbonize New York. Just as statewide carbon emissions climbed overnight when Indian Point closed,¹⁴ reviving plant operations would decrease New York's emissions as soon they come online. The premature and ill-advised shuttering of Indian Point, which provided 25% of the region's electricity, has had a disastrous impact on the State's goal of achieving zero-emissions and is another example of public officials pandering to activists who are more concerned with the optics of clean energy than a reduction in carbon emissions. NYPA's advocacy for nuclear could help change the State's current focus on wind and solar projects.

A shift in focus to nuclear and hydropower would also significantly reduce the amount of land devoted to energy generation, and avoid the substantial adverse environmental impacts created by excessive wind and solar generation capacity. Large-scale renewables are expected to provide up to "half of the renewable energy procured to meet the 70% Climate Act goal."¹⁵ To achieve that requires the destruction of about a million acres of carbon-sequestering forest and farmland, to be replaced with wind turbines, solar panels and their infrastructure. These lands must be sacrificed for 55 gigawatts of solar panels (all made in China) and 10 GW of mostly foreign-made onshore wind.

In addition to environmental impacts, over-reliance on wind and solar technologies are likely to adversely impact the larger economy, as they rely heavily on substantial direct subsidies and massive investments in batteries, transmission and backup generation. Direct subsidies include federal tax credits and state Renewable Energy Credits (RECs). Under the federal Inflation Reduction Act (IRA), Renewable Electricity Production Tax Credits (PTC), "receive an inflation-adjusted credit of 2.6 cents

Basis (2021), 238-239, <<https://www.ipcc.ch/report/ar6/wg1>>; International Energy Agency (IEA), "Net Zero Roadmap: A Global Pathway to Keep the 1.5° C Goal in Reach: 2023 Update", Figure 2.3, <<https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-1-5-0c-goal-in-reach>>. Cf. Roger Pielke Jr., Matthew G. Burgess and Justin Ritchie, "Plausible 2005–2050 emissions scenarios project between 2 °C and 3 °C of warming by 2100", 17 *Environ. Res. Lett.* 024027 (2022) (discussing the above-referenced IPCC and IEA reports). See also IPCC, Sixth Assessment Report, Vol. WG1, *The Physical Science Basis*, 1856, Table 12.12 (indicating that no signal has emerged from the natural variability of climate change for most extreme weather events).

14 Oliver Milman, "A nuclear plant's closure was hailed as a green win. Then emissions went up", *The Guardian* (March 20, 2024), <<https://www.theguardian.com/environment/2024/mar/20/nuclear-plant-closure-carbon-emissions-new-york>>.

15 NYS Comptroller, "Climate Act Goals", 14.

per kWh [\$26 for each MWh generated] for the first 10 years of electricity generation.”¹⁶ The PTC thus allows electricity from wind turbine projects to be sold into the market at a price of *negative \$25 per MWh* and still be profitable. The IRA made the 10-year PTC permanent after decades of reauthorizations which had already resulted in wind energy projects bidding negative numbers into the wholesale market for electricity. The PTC is the single most expensive energy-related tax expenditure in the federal code, expected to cost \$276.6 billion between 2024 and 2033.¹⁷

New York can be expected to follow the trend across the nation, where the most negative pricing for electricity occurs where wind and solar penetration are greatest.¹⁸ The PTC incentivizes waste (since the subsidy is available even when the electricity generated isn’t needed) and the premature closure of reliable generators of electricity (who can’t compete). The cost to taxpayers is roughly the cost of renewable energy without the PTC, or about \$32 per MWh.¹⁹ After 10 years, a wind or solar project can requalify for another 10 years of PTC support by replacing major components—well before the end of their useful life. The tax incentive has driven such “repowering” projects, which occur when wind projects are 9 to 16 years old, with a median age of 10 years.²⁰ These market dynamics shift the cost of generation from wind and solar generators and ratepayers to federal taxpayers, and progressively destabilize the grid. This is a perfect example of privatizing profits while socializing losses.

New York adds a substantial layer of subsidies with RECs, the cost of which are paid by ratepayers. Each REC represents one MWh of electricity generated by a wind or solar facility. RECs are awarded by NYSERDA to large-scale renewables in return for a promise to generate. There are no costs for RECs borne by the sponsor of a renewable energy facility. New York’s projected annual electricity demand is at least 200 million MWh by 2040.²¹ Since one REC represents one MWh, 200 million RECs will be required each year. If RECs cost \$20 each,²² the amount New Yorkers must provide in order to subsidize 100% of electricity demand with RECs is \$4 trillion in 2040.²³ Since the cost of RECs has not been

16 U.S. Dep’t of Energy, “Advancing the Growth of the U.S. Wind Industry: Federal Incentives, Funding, and Partnership Opportunities”, 2, <<https://www.energy.gov/sites/default/files/2023-02/weto-funding-fact-sheet-feb-23.pdf>>.

17 U.S. Dep’t of the Treasury, “Tax Expenditures”, <<https://home.treasury.gov/policy-issues/tax-policy/tax-expenditures>>.

18 See Lawrence Berkeley National Laboratory, “Exploring Wholesale Energy Price Trends” (May 20, 2021), <<https://emp.lbl.gov/news/new-data-tool-explores-trends>>.

19 U.S. Dep’t of Energy, “Land-Based Wind Market Report: 2022 Edition”, 50, <<https://www.energy.gov/eere/wind/articles/land-based-wind-market-report-2022-edition>>.

20 *Id.*, 31.

21 NYISO, “2023-2042 System & Resource Outlook” (July 23, 2024), 30, <<https://www.nyiso.com/documents/20142/46037414/2023-2042-System-Resource-Outlook.pdf>>.

22 The most recent RGGI auction (June 5, 2024) sold RECs for \$21.03. See <<https://www.rggi.org/auctions/auction-results/prices-volumes>>.

23 This excludes the cost of new transmission capacity, the roughly 75% discount on local sales and property taxes for renewables (provided under typical PILOT agreements), and subsidies for residential solar energy. For the latter, see Norman Rogers, “Useless Residential Solar Electricity”, *RealClearEnergy* (July 30, 2024), <https://www.realclearenergy.org/articles/2024/07/30/useless_residential_solar_electricity_1048193.html>.

procured by the State,²⁴ the entire cost of the program will fall on ratepayers and taxpayers. Many New Yorkers will pay twice, once as a ratepayer and again as a taxpayer.

In addition to the cost of RECs and other subsidies, renewables are likely to face increasing interconnection costs imposed by utilities to ensure “grid reliability and safety to prevent arc flashes, wildfires or injuries to line workers.” In Virginia, for mid- and large-scale solar projects, Dominion Energy requires costly upgrades for a “direct transfer trip” which automatically disconnects a system. The upgrades “include[] laying a dark fiber optic transmission line to a substation at a cost of \$150,000 to \$250,000 per mile and in some cases adding a relay panel that runs \$250,000 for projects exceeding 250 kilowatts, raising costs by 20 to 40 percent.”²⁵

The cost of needed transmission upgrades also includes expected steep increases in the cost of copper, driven by the CLCPA’s policy to increase end-use electrification.²⁶

New York’s grid is expected to become winter peaking as a result of increasing electrification, and this will add further costs. Eventually, ratepayers will need to subsidize baseload and backup power in order to keep a high-renewables grid stable. Wind and solar cannot ensure their performance will achieve planned capacity factors.²⁷ Wind and solar droughts are certain, and solar provides very little energy during the winter. These resources are therefore unable to keep up with demand growth, particularly in the winter. As other jurisdictions have found, demand growth requires more, not less dispatchable generation.²⁸ None of these costs would occur but for the cost of firming the grid to make up for wind and solar intermittency.

Achieving New York’s emission reductions goals with renewables also requires yet-to-be-

24 NYS Comptroller, “Climate Act Goals”, 14.

25 Jim Morrison, “Va. went all in on solar. Then its powerful utility changed the rules”, *Washington Post* (May 27, 2024), <<https://wapo.st/4dT2bzB>>.

26 *Cf.* International Energy Forum, “Copper Mining and Vehicle Electrification” (May 2024), <<https://www.ief.org/focus/ief-reports/copper-mining-and-vehicle-electrification>>. Note that the Climate Action Council’s *Final Scoping Plan* (December 2022), at 123, 179-180, calls for approximately 1 to 2 million homes electrified with heat pumps by 2030 and approximately 3 million zero-emission vehicles (predominantly battery electric) sold by 2030. Available at <<https://climate.ny.gov/resources/scoping-plan/>>.

27 Annual capacity factors relied on for planning purposes by NYISO are 12.89% for land-based wind, 15.64% for solar, and 31.56% for offshore wind. NYISO, “Final Capacity Accreditation Factors for the 2024/2025 Capability Year”, <<https://www.nyiso.com/documents/20142/41593818/Final-CAFs-for-the-2024-2025-capability-year.pdf>>. Today, actual annual generation of electricity in New York by wind is 4,110.4 GWh, while nuclear generates 13,285,581.9 GWh and hydropower generates 28,674.7 GWh. NYISO, *2022 Goldbook*, Table III-3c, <<https://www.nyiso.com/documents/20142/2226333/2022-Gold-Book-Final-Public.pdf>>. For illustration, the 6.4 square mile Palo Verde Nuclear Generating Station in Phoenix, Arizona, generates 244 times as much electricity—reliably—than a 1,600 square mile wind energy facility. Ken Braun, “The biggest wind energy project on this side of the Earth and its tiny power output”, *Substack* (April 6, 2024).

28 In 2023 Texas mandated baseload and backup power subsidies to address grid instability caused by increased penetration of wind and solar power. Texas Senate Bill No. 2627. The same function is served by ZECs for nuclear power in New York; and California’s Civil Nuclear Credit Program, which awarded \$1.1 billion to extend the life of the Diablo Canyon Power Plant. S.B. No 846 (September 2, 2022). “Despite California adding more renewable energy, it is still having issues during peak demand times, which has led the state to ask residents not to charge their cars or lower the temperature on their air conditioning.” NYS Comptroller, “Climate Act Goals—Planning”, 16.

demonstrated “dispatchable emissions-free technologies” (DEFR),²⁹ including long-term energy storage technology.³⁰ However, PSC has yet to seriously address this problem.³¹ Examples of DEFR (none of which are commercially available) include “long-duration batteries, small modular nuclear reactors, hydrogen-powered generators, and fuel cells.”³² Without these sources, NYISO suggests that the limit for renewables in New York has been reached: further penetration of renewables without substantial DEFR (assuming that fossil-fueled backup will continue to be deactivated)³³ is projected to cause reliability crises.³⁴

Nuclear power can be developed in New York as fast or faster than DEFR. China is building 30 new nuclear plants and may be “10 to 15 years ahead of the US in its ability to deploy fourth-generation nuclear reactors at scale”, demonstrating that “it’s possible to make large strides toward clean, around-the-clock energy using existing nuclear technology—if accompanied by generous financial terms, consistent state support and rigorous safety standards.”³⁵ Government efforts to accelerate the deployment of nuclear power have emerged around the world in the last two years.³⁶ NYSERDA Chair Doreen Harris stated recently that nuclear power is an “advanced area of commercial viability, as opposed to some of the other resources that we see on the technical horizon at this point”.³⁷

29 NYISO, *Power Trends 2022* (in addition to local and long-distance transmission capacity additions, and in addition to long-term electricity storage—neither of which is projected to exist in time—significant amounts of yet-to-be-invented on-demand, zero-emission flexible generation that can back up the weather-related intermittency of renewables will be needed to achieve the 2030 and 2040 Climate Act goals).

30 See PSC Case 18-E-0130, *In the Matter of Energy Storage Deployment Program* (June 20, 2024), 28-30 (adopting a goal of 6 GW of electricity storage capacity, including 3 GW of “bulk level” (*i.e.*, utility-scale) storage by 2030, and over 4 GWs of 8-hour storage by 2035. NYPA is building two 12-hour storage demonstration projects expected to be operational in 2028. American Public Power Association, “NYPA to Participate in Energy Storage Demonstration Using Fire-Safe Battery Technology” (July 25, 2024), <<https://www.publicpower.org/periodical/article/ny-pa-participate-energy-storage-demonstration-using-fire-safe-battery-technology>>.

31 NYS Comptroller, “Climate Act Goals”, 14.

32 NYISO, “2023-2042 System & Resource Outlook” (July 23, 2024), 8-9, <https://www.nyiso.com/documents/20142/44646498/03b_Draft%2520Report_2023-2042_System_Resource_Outlook.pdf>

33 For example, the proposed NY-HEAT Act would eliminate existing gas services for end-users. Section 7 of the Act acknowledges gas service may be limited or discontinued to facilitate achievement of the CLCPA climate justice and emission reduction goals; Section 8 grants PSC the authority to order the curtailment or discontinuance of the use gas for any customer or section of the gas distribution system in order to implement state energy policy; and Section 11 removes the entitlement to continuation of gas service following the demolition and reconstruction of any structure owned by a customer. See Senate Bill S2016A, <<https://www.nysenate.gov/legislation/bills/2023/S2016/amendment/A>>.

34 NYISO, “2023-2042 System & Resource Outlook”, 47-48.

35 Bloomberg News, “China Is Rapidly Building Nuclear Power Plants as the Rest of the World Stalls” (August 7, 2024), <<https://www.bloomberg.com/news/articles/2024-08-07/what-china-can-teach-the-world-about-nuclear-power?smd=markets-magazine-v2>>.

36 Sama Bilbao y León, Director General, World Nuclear Association, “Nuclear energy in 24/7 carbon-free energy systems: meeting the moment”, *Energy Connects* (July 18, 2024), <<https://www.energyconnects.com/opinion/thought-leadership/2024/july/nuclear-energy-in-24-7-carbon-free-energy-systems-meeting-the-moment/>>.

37 Tim Knauss, “New nuclear power will be on the agenda when NY officials hold energy summit in Syracuse”, *Syracuse.com* (August 8, 2024), <<https://www.msn.com/en-us/weather/topstories/new-nuclear-power-will-be-on-the-agenda-when-ny-officials-hold-energy-summit-in-syracuse/ar-AA1ojP5h>>.

Developing nuclear power is substantially less expensive than developing wind and solar power. As noted, renewables require large system costs to reliably serve electricity demand (including DEFER). This requirement flows directly from renewables' unreliability. Nuclear power does not require such system costs. This makes nuclear power less expensive than using wind, solar, battery storage, gas-fired backup power, and substantial transmission upgrades. In addition, nuclear does not require load balancing using battery or alternative emissions-free technologies. When the fact that renewables last only 30 years and must be repowered one or more times during that period, while nuclear reactors are permitted for 40 years and can be renewed for another 40 years, the cost difference between renewables and nuclear widens even further. While the upfront capital costs of a nuclear plant are high, once the capital costs are paid, the only costs are fuel and operating expenses. As a result, nuclear provides reliable service at a substantially lower cost than wind, solar, and battery storage.³⁸

Nuclear plants' small footprint, compared to large scale renewables, has a far less damaging effect on the State's natural resources and environment. One only need consider the impact of a single blade failure in Nantucket, to understand the significant adverse impacts that such projects can have on the environment.³⁹

NYPA should focus on bulk transmission that connects upstate power sources to the downstate grid, and transmission support for converting shuttered power plants (e.g., Jamestown, Somerset) to nuclear. For example, Constellation Energy and Pennsylvania officials are considering state funding to restart of part of Constellation's Three Mile Island power facility, the site of a nuclear meltdown in the 1970.⁴⁰ A cryptomining company has signed a memorandum of understanding to replace hydroelectric energy with a portable nuclear microreactor at a decommissioned coal power plant in the City of Niagara Falls.⁴¹ Micron Technology is building a chip factory in the Syracuse area because the proposed site has access to Oswego County nuclear energy.⁴²

The CLCPA emissions reduction goals can be achieved with a handful of new nuclear power plants. Unlike renewables, new transmission needed for new nuclear plants should be minimal.

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- 38 Cf. Matthew L. Wald, "Dollars, Sense, and Kilowatt-Hours", *Breakthrough Institute* (May 2, 2023), <<https://thebreakthrough.org/issues/energy/lcoe-lazard-misleading-nuclear>>; Isaac Orr and Mitch Rolling, "Why Nuclear is Cheaper than Wind and Solar", *Cornwall Alliance* (July 17, 2024), <<https://cornwallalliance.org/2024/07/why-nuclear-is-cheaper-than-wind-and-solar/>>. Backup power for renewables cannot be avoided regardless of how much renewables penetrate the grid because unpredictable renewables cannot energize the grid with baseload power.
- 39 Owen Klinsky, "'Bunch Of Suits Trying To Cover Their Tracks': Beach Town Locals Slam Offshore Wind Developer For Polluting Shores", *Daily Caller* (July 18, 2024), <<https://dailycaller.com/2024/07/18/nantucket-locals-slam-offshore-wind-developer/>>.
- 40 Laila Kearney and Jarrett Renshaw, "Constellation talking to Pennsylvania on Three Mile Island restart, sources say", *Reuters* (July 2, 2024), <<https://www.reuters.com/business/energy/constellation-talking-pennsylvania-three-mile-island-restart-sources-say-2024-07-02/>>.
- 41 Dan Swinhoe, "Nano and Blockfusion hope to deploy nuclear microreactors at Niagara Falls data center", *The Critical Power Channel*, <<https://www.datacenterdynamics.com/en/news/nano-and-blockfusion-to-deploy-nuclear-microreactors-at-niagara-falls-data-center/>>. See also Steve Buchiere, "Wayne County Board of Supervisors push for new nuclear facility", *Finger Lakes Times* (July 19, 2024), <https://www.fltimes.com/news/wayne-county-board-of-supervisors-push-for-new-nuclear-facility/article_283b3a2a-443f-11ef-8f49-c760c57e9372.html>.
- 42 Nuclear Newswire, "Senate committee discusses growing energy demands, nuclear's role" (May 22, 2024), <<https://www.ans.org/news/article-6066/senate-committee-discusses-growing-energy-demands-nuclears-role/>>.

Decommissioned power plants already have the needed transmission capacity. Additional nuclear plant sites can be selected based on their proximity to existing or upgraded transmission capacity. Moreover, nuclear power plants provide high-paying jobs. In contrast, virtually no new permanent positions are created by industrial solar or wind projects. Maintenance is generally provided by out-of-area specialists. The small footprint of a nuclear power plant, the ability to utilize existing transmission infrastructure, and the local employment nuclear power plants provide should avoid most of the opposition to siting new generation and transmission capacity. Such opposition has and will continue to make the siting of large-scale renewables and the transmission infrastructure they require, at least at the scale projected to meet the CLCPA's 2030 renewables goal, increasingly challenging.⁴³

In summary, NYPA should reject entrenched ideological bounds limiting acceptable decarbonization technologies. Neglecting to consider nuclear power leaves the potential for effective pathways to decarbonization unexplored. The undersigned have all been heavily involved in the State's efforts to site new wind and solar generation and transmission capacity. It is painfully obvious that wind and solar have already reached their maximum positive potential. The favored sites for new renewable generation have mostly been taken, diminishing the potential for contributing to the CLCPA goals by this pathway. We therefore urge NYPA to support the CLPCA by pursuing new nuclear and hydropower generating capacity, rather than continuing to pursue the fantasy of an electric grid powered primarily by intermittent and unreliable wind and solar energy.

3. HOW NYPA IS ALREADY SUPPORTING THE CLCPA.

For the reasons set forth above, NYPA's current focus on increasing wind and solar generation capacity, and creating associated new transmission lines and substations, should be abandoned for technical, environmental, and economic reasons. Furthermore, detailed system modeling for the benefits of Clean Path NY should be developed, focusing on how much upstate electricity the originating substation at Delhi can provide, and where among the NYISO regions that electricity is generated.

4. CONCLUDING REMARKS.

There are compelling reasons to undertake feasible programs to decarbonize New York. Intensive oil and gas drilling causes environmental degradation (*e.g.*, land drainage, landscape alteration, tectonic movements, and oil spills on land and at sea). The burning of petroleum products often emits toxic substances that can degrade both interior and exterior environments. It may even be reasonable for the state government to conclude that New York has a moral obligation to reduce carbon emissions in light of New York's vanishingly small contribution to anthropogenic global climate change. The undersigned therefore support New York's efforts to prioritize low emission energy sources.

However, there is growing evidence that New York's over-emphasis on wind and solar generation is damaging the grid, the environment and the economy. The state's heavy handed energy siting programs administered by the Public Service Commission, the Siting Board, and ORES, have also led to

43 *Cf.* Mary Katherine Wildeman and Melina Walling, "Wind farms' benefits to communities can be slow or complex, leading to opposition and misinformation", *AP News* (July 25, 2024), <<https://apnews.com/article/wind-turbines-farms-power-taxes-misinformation-rural-ed60fdf6e0e6577797035b1f1fd2f20>> (opponents complain that "people's taxes don't go down, and wind farms take away from an area's natural beauty").

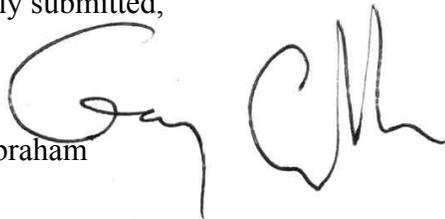
significant public unrest and loss of faith in whether such agencies are serving the public interest, or something else. We therefore implore NYPA to reject unsubstantiated arguments about the benefits of politically favored energy technologies like wind and solar energy. The reality is that wind and solar energy, when pursued to excess, hinder economic development, waste public resources, and degrade large amounts of land. This makes the impact of renewables virtually indistinguishable from the fossil fuels they are replacing.

The global energy crisis precipitated by the invasion of Ukraine, Covid, and supply chain constraints have little to do with the constraints on New York's ability to implement the CLCPA. The physical reality of how the grid works predated these events and will remain with us for the foreseeable future. It was true before the global energy crisis, and it will remain the case that an electric system that relies primarily on weather-dependent resources will not be more resilient and will not be able to better withstand extreme weather events than a grid that is built around reliable sources of energy.

Electricity demand in New York and neighboring jurisdictions will only grow for the foreseeable future, and carbon emissions worldwide are climbing.⁴⁴ If we want to substantially reduce the need for fossil-fuel infrastructure, we will need to maintain our current fleet of nuclear reactors and vigorously and quickly support new nuclear power development. We therefore urge NYPA to support the CLPCA by pursuing new nuclear and hydro generating capacity, rather than continuing to pursue the fantasy of an electric grid powered by excessive amounts of intermittent and unreliable wind and solar energy.

Respectfully submitted,

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44 Energy Institute, "2024 Statistical Review of World Energy", 16, <<https://www.energyinst.org/statistical-review>>.

NYPA Comments (2 minutes, August 19, 2025)

My name is Janet Lenichek. I live in Williamsville, NY. I am a member and active volunteer with the Sierra Club.

According to an analysis from *Clean Energy Associates*, the new federal tax rules could result in a reduction in the building of **60 GW of clean energy** over the next five years.

The US can't afford to lose this energy generation capacity. Electricity demand is growing faster than it has in decades due to massive data centers, building/vehicle electrification and re-shoring of some portions of US manufacturing!

When energy demand goes up and supply doesn't meet the demand, energy prices go up. This is happening across the country and in NYS!

This is a crucial time for New York and other visionary states to make plans and take actions that will quickly advance renewable energy development. The states must lead on renewable energy because our current federal government has abdicated its responsibility.

According to an article published in Reuters in June of this year, land-based wind and solar generated power are the least expensive forms of electricity in the United States, even without government subsidies.

NYPA's plan to increase renewable energy production in NYS is a breath of fresh air during these awful times of negative news coming from Washington, DC.

At the same time that our federal government is slowing the transition to renewable energy, NYPA has acted responsibly and put together a solid plan to expand renewable energy capacity in order to meet the future electrical energy needs of NYS.

KUDOS and thank you for your work in putting this plan together.



September 12, 2025

New York Power Authority
123 Main Street
White Plains, NY 10601-3170

Submitted via the public comment portals <https://publiccomments.nypa.gov/form> and <https://www.nypa.gov/Contact-Forms/Renewables> and by email to NYPARenewablesConferral@nypa.gov

Re: Comments on the 2025 NYPA Renewables DRAFT Updated Strategic Plan and Conferral Process

Dear New York Power Authority,

Please accept the following comments from New York Energy & Climate Advocates (NYECA) regarding the Draft Renewables Strategic Plan prepared by the New York Power Authority (NYPA).

We are a non-profit, volunteer-based organization that understands the reality of climate change and the need for timely action, employing effective solutions that work in the real world. NYECA has been an active participant in state proceedings affecting climate and energy policy since 2020. We have provided technical comments to the state Climate Action Council, Public Service Commission (PSC), New York State Energy Research and Development Authority (NYSERDA), and legislative committees. We also communicate with state and local legislators, communities, trade groups, industry, and business. In September 2024, we attended the Governor's *Future Energy Economy Summit* in Syracuse and subsequently contributed to comments on NYSERDA's draft *Blueprint for Consideration of Advanced Nuclear Technologies*. We also submitted comments on the first draft of the NYPA Renewables Strategic Plan last year, testified at public hearings of the draft plan, and participated in NYPA's conferral outreach. This year we testified during the public hearing process and participated in NYPA's conferral outreach as well.

Since NYPA is seeking public comment on the Renewable Strategic Plan update and input on the Conferral Process simultaneously this year, we provide the following in response to both activities.

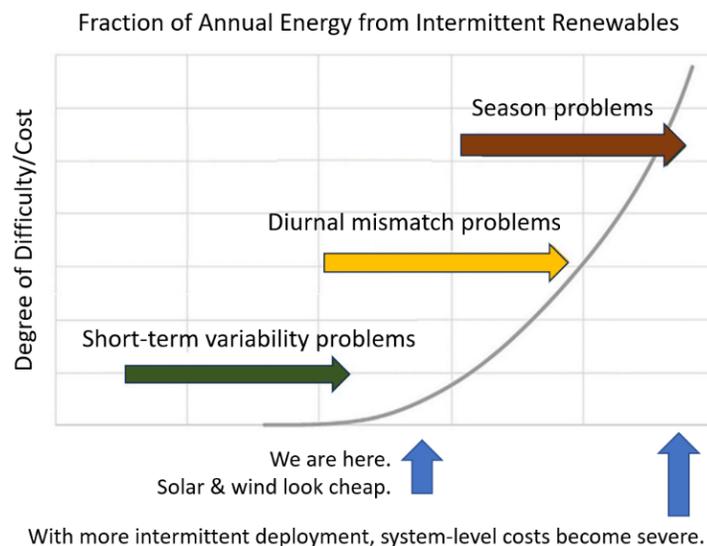
NYPA's History and the Role of Public Power

As expressed in prior comments, we wish to acknowledge the incredibly important role that NYPA has played to ensure that New Yorkers have access to reliable, clean, and affordable electricity. As the operator of New York's large hydropower plants, NYPA produces 20% of electricity generated in-state, the vast majority of renewable energy in New York, and nearly half of the state's carbon-free electricity. Historically, NYPA has also positioned New York as a leader in nuclear power by facilitating the development of reactors like James Fitzpatrick, named after its former chair. These investments in firm clean power are the chief reason why New York's upstate grid is 90% carbon-free today. Moreover, by building and operating

important transmission infrastructure, pumped-storage, and other strategic assets, NYPA has consistently worked to ensure that the state’s electric grid performs efficiently and reliably.

The above activities have exemplified the best use of a public power authority: advancing the development of vital projects that serve the public good but are more challenging for the private sector to pursue on its own—either because they are complex, have higher up-front cost, or a longer return on investment. **We believe that NYPA’s development of additional reliable high-capacity-factor nuclear power pursuant to recent direction by Governor Hochul is also entirely consistent with this prudent appropriation of a public power.** Notable, the American Public Power Association (APPA), which has existed since 1940, is a strong supporter of nuclear energy.¹ APPA even highlights NYPA new nuclear initiative on its website.² By investing wisely in firm generation and strategically important infrastructure where it is most needed, NYPA has ensured an electric system for ratepayers and business that is both reliable and affordable.

Having said this, we are concerned that legislative mandates placed on NYPA to deploy large amounts of fragile, intermittent, low-capacity-factor forms of energy—namely solar and wind, plus battery storage—threaten this impressive legacy. Proponents claim that solar and wind are cheap. However, this is with extensive subsidies (that are ending soon) and overseas manufacturing that often occurs under conditions in which neither the environment nor environmental justice is respected. Indeed 80% of solar panels deployed in the United States are made in China. Moreover, the old adage applies: “You get what you pay for.” A system involving substantial amounts of “cheap” solar and wind requires large amounts of additional support infrastructure—transmission, storage, backup generation, and various ancillary equipment (such as synchronous condensers to compensate for the lack of spinning-mass generators). All of this adds cost and complexity, which become more pronounced as more intermittent generation is added to the system.



¹ American Public Power Association-Powering Strong Communities, Issue Brief: *Nuclear Power*, July 2025.

https://www.publicpower.org/sites/default/files/70%202025%20PMC%20Issue%20Briefs_Nuclear%20FINAL.pdf

² Ciampoli, *New York Governor Directs NYPA to Develop and Construct Advanced Nuclear Power Plant*, APPA, June 23, 2025.

<https://www.publicpower.org/periodical/article/new-york-governor-directs-ny-pa-develop-and-construct-advanced-nuclear-power-plant>

Solar and wind installation are also fragile resources, vulnerable to the elements, with relatively short lifespans. Neither reliable nor resilient, they degrade or fail quickly over time, requiring replacement typically after twenty years of operation. Similarly, lithium-ion batteries used for grid storage last only about ten years. On the other hand, hydropower and nuclear power plants are robust facilities that can last 80 years or more, providing reliable high-capacity-factor electricity 24/7 in response to customer demand rather than the weather. When system-level factors are considered, renewables are not cheap.

We are concerned that placing undue focus on underperforming resources that do not last will condemn New Yorkers to less reliable and more expensive electricity. We are also concerned that if NYPA dedicates so much of its attention and financial resources to the rapid deployment of solar and wind, it will not have the ability to help develop the support infrastructure mentioned above that the private sector is unlikely to build but will become increasingly important. Moreover, we are concerned that misplaced priorities could result in NYPA not having adequate resources to invest in firm carbon-free generation—including nuclear power—essential to achieve the goal of a zero-emission grid.

Unfortunately, original motivation for the Build Public Renewables Act came from interests that substitute ideological views about preferred technologies (and who should operate them) for a solid understanding of energy. Many believe that the only barrier to carbon-free electricity is that the private sector is not building solar and wind projects fast enough, or that the reason for rising cost is corporate greed rather than anything associated with the technologies pursued. Likewise, a bizarre paradigm has crept into New York energy planning which assumes that the state must first maximize the buildout of intermittent generation, then maximize the buildout of storage and transmission, and then only as a last resort consider reliable firm generation as “backup”. Such a Rube Goldberg approach ignores numerous credible analyses confirming that decarbonization strategies which rely predominantly on intermittent generation are less feasible and more costly than those which use a balance of resources, including those capable of baseload or load-following operation.³ Significantly, business, and labor leaders are now also sounding the alarm that by increasing cost and hindering the production of ample reliable energy for industry, such an approach will devastate New York’s economy. Rather than reinventing the wheel, N&PA should build upon its prior success by pursuing the development of firm carbon-free resources not just as **backup** for intermittent generation, but as part of the **backbone** of an efficient electricity system to serve a meaningful portion of demand.

Whether industrial wind and solar projects are built by NYPA or private industry, New York will fail to decarbonize its electric grid—and thus fail to achieve its greenhouse gas reduction goals—if it does not acknowledge the fundamental obstacles of intermittency, storage, transmission, and low-energy-density that prevent renewables alone from meeting the energy needs of society. Furthermore, since gas-fired generators will likely satisfy demand when intermittent sources are unavailable and batteries are depleted, building a system that is overly dependent on solar and wind threatens to lock in fossil fuels. As previously discussed, the best use of a public power authority is to develop vital projects that serve the public good but are more challenging for the private sector to pursue on its own. Building additional nuclear capacity, hydropower (or hydropower capacity uprates) where feasible, and transmission infrastructure are wise uses

³ NYECA, Comments of Draft Scoping Plan, 7-1-22.

https://www.nuclearny.org/wp-content/uploads/2022/07/NYECA-Scoping-Plan-comments_7-1-22rSchue_Rodberg.pdf

of public power. The installation of underperforming solar and wind projects that do not last and weaken the grid is not.

The Renewables Strategic Plan Update and Ideological Failure

We respect that NYPA is stuck between a proverbially “rock and a hard place,” attempting to respond to the demands of activists who do not understand energy while striving to meet its commitments to providing reliable, affordable electricity essential the state’s economic future. The draft update proposes to develop or assist in the development of 7 GW of renewable energy projects. Yet a vocal minority of downstate voices remain unsatisfied, insisting on no less than 15GW.

NYSERDA identified several factors for a predicted shortfall of renewables in its last Biennial Review including interest rates, inflation, supply chains, and workforce issues. Therefore, even if the state and NYPA had unlimited financing resources, logistics would prevent 15GW of renewable capacity from being installed. The demand for NYPA to procure 15 GW of renewables by 2030 also ignores infrastructure improvements, including transmission and storage, that would be necessary by that time to deliver electricity to customers when and where it is needed. Even if 15 GW of additional solar and wind capacity could be deployed by 2030, the 70% goal could not be achieved due curtailment.

However, in our view, what is most concerning about the ideologically-driven insistence that New York achieve a certain quota of “renewables” is that it loses sight of the salient objective for which the CLCPA was crafted, which is greenhouse gas reduction. As we have discussed, the inherent challenges of intermittency escalate as more intermittent resources are added, thereby making a zero-emission grid that involves predominantly renewable sources difficult or impossible to achieve.

It is not hard to predict what will happen if NYPA, NYSERDA, and the PSC allow themselves to be pressured into accommodating an agenda that fails to devote meaningful resources to the development of firm carbon-free generation. Pursuing a herculean effort with solar, wind, and batteries, the state might achieve—at least temporarily—a scenario in which 70% of its electricity comes from “renewable” sources. However, it will have done so at great expense to ratepayers or taxpayers, and exhausted its ability to move beyond that threshold. It is also unlikely that the state would be able to retain this level of penetration as load growth continues. We note that Micron’s planned semiconductor facility alone is expected to consume as much electricity as the states of Vermont and New Hampshire combined.

As already witnessed in New York, the crude “copper-plate” analysis performed by NYSERDA as part of its Integration Analysis for the Climate Action Council is not an accurate predictor of what is achievable. Nor is it a valid predictor of how much capacity or total energy generation from Dispatchable Emission Free Resources (DEFERs) will be needed in an actual grid. Prior predictions that the state could get by with 18 GW of DEFERs operating at a capacity factor of merely 2% in unrealistic. (We find similar problems in various pathway analyses provided in the draft State Energy Plan, now out for public comment.) As such, hydrogen or renewable natural gas (RNG) will be insufficient in a “gap filling” paradigm that maximizes intermittent

generation.⁴ Unless New York invests in high-capacity firm generation (nuclear power), much of the state's electricity will continue to come from dispatchable fossil fuels in 2040 and beyond.

We believe that **New York agencies and authorities need to be as honest in their discussion of energy issues as Governor Hochul, who has said correctly and directly that unless New York invests in additional reliable high-capacity nuclear energy, fossil fuel power plants will keep running.** By labeling any resource not defined as "renewable" as a "false solution" and discriminating against firm carbon-free alternatives, misguided activists seek to deprive New York of the tools that will be critical in the years ahead to fully decarbonize its electric grid. In so doing, they threaten the CLPCA with failure and could lock in fossil fuels long-term. NYPA and other state agencies should not let that happen.

Recommendations

It is possible for NYPA to craft a Renewables Strategic Plan that complies with the additional authority it has been granted without jeopardizing reliability or climate goals. However, doing so requires recognizing the broader authority and responsibility that NYPA possesses.

As discussed, we are concerned that by directing so much of its attention and resources to the buildout of solar and wind, NYPA may jeopardize its ability to address system-level needs of the grid that are certain to balloon in the future if more intermittent renewables come online. NYPA now has expanded authority to build renewables. However, nowhere in that enabling legislation does it mandate that reliability or decarbonization goals be sacrificed to achieve a certain quota of solar and wind capacity. We urge NYPA to perform a substantive analysis of how its pursuit of large-scale intermittent generation will impact not only its ability to meet its existing obligations, but also future needs of the grid that it will most certainly be called upon to address.

NYPA also retains its long-standing authority to develop reliable hydropower and nuclear resources. In June of this year, Governor Hochul invoked this authority by directing NYPA to build **at least** a gigawatt of advanced nuclear capacity.⁵ Recognizing that a diversity of resources will be necessary to decarbonize New York's grid, NYPA should perform a comprehensive analysis of system level needs, including the provision of both intermittent and firm generation. This is not only consistent with NYPA's authority under Article V, but given that DEFRs are essential to the integration of solar and wind into the grid, it is consistent with NYPA's expanded authority to facilitate renewables.

Such an evaluation should be required to demonstrate that any investments in intermittent generation will not limit NYPA's ability to provide essential support for the development of firm carbon-free generation and necessary infrastructure. NYPA should also carefully evaluate the most effective combination of technologies with attention to the end-goal of zero-emission electricity. We strongly recommend as part of

⁴ NYSERDA Integration Analysis, Annex 2 Key Driver and Outputs (Revised), Scenario 3, September 15, 2023.

<https://www.nysenda.ny.gov/-/media/Project/Nyserda/Files/Publications/Energy-Analysis/IA-Annex-2-Key-Drivers-andOutputs-2022-revised.xlsx>

⁵ Press Release: Governor Hochul Directs New York Power Authority to Develop a Zero-Emission Advanced Nuclear Energy Technology Power Plant, June 23, 2025. <https://www.governor.ny.gov/news/governor-hochul-directs-new-york-power-authority-develop-zero-emission-advanced-nuclear-energy>

this that NYPA perform its own modeling of how intermittent generation, firm generation, storage, and imported resources interact in a grid that most closely approximate real-world condition, including the temporal uncertainty of renewables and an actual transmission network.

NYPA is well-suited to assist in the development of advanced nuclear energy, including first-of-a-kind technologies. We have provided substantial comments regarding the *Blueprint for Consideration of Advanced Nuclear Technology* and are following work involved with the *Masterplan for Responsible Advanced Nuclear Development in New York* that is currently underway.⁶ A distinct advantage of advanced nuclear power over a low-capacity-factor DEFR is its ability to reduce the complexity of New York's future electric system. Notably, in 2022, NYSERDA determined that by adding 4 GW of advanced nuclear power, New York could eliminate the need for 12 GW of intermittent generation and avoid 5 GW of storage or DEFR capacity.⁷ This in turn promises to lower system-wide cost, reduce impact on land and natural resources, and help to make an otherwise unrealistic task feasible. We therefore believe that NYPA should consider at least 4GW of nuclear by 2040.

We believe that advanced nuclear power is also key to addressing growing opposition to the CLCPA. Today the Office of Renewable Energy Siting threatens to override local laws and approve intrusive industrial-scale solar or wind projects that communities oppose. As a result, many people upstate feel that the "community protection" part of the CLCPA does not apply to them. If New York continues to prioritize sprawling solar and wind over reliable compact technology, it will lose support for action on climate change. On other hand, by pursuing a rational expansion of solar and wind in combination with a rational expansion of nuclear power, the state can succeed. Notably, several upstate communities have already expressed interest in advanced nuclear. Communities that favor carbon-free alternatives, especially those that improve reliability, deserve NYPA's support.

Although we understand that the potential for more hydropower in-state is limited, where possible NYPA should also explore potential enhancements to existing facilities and responsible run-of-river projects. An example of this is the Green Island Hydroelectric Power Station on the Hudson River. Original built by Henry Ford in 1921, the facility was acquired by the Green Island Power Authority (GIPA) in 2000 and rehabilitated in 2001.⁸ Plan have existing since 2009 to expand the plant, which could generate reliable renewable power serving New York's capital.⁹ Lacking state support, however, progress has languished. NYPA should partner with GIPA to make this expansion project a reality.

Blanketing the state with sprawling solar and wind is neither a wise use of public resources, nor is it a winning climate strategy. However, to the extent such projects are pursued, NYPA should focus on land within the downstate region, closer to load centers where demand for carbon-free electricity is greatest.

⁶ Nuclear New York, Mothers for Nuclear, New York Energy & Climate Advocates, Comments on Draft Blueprint for Consideration of Advanced Nuclear Technologies, November 8, 2024. <https://www.nuclearny.org/wp-content/uploads/2024/11/NNY-MFN-NYECA-NYSERDA-Nuclear-Blueprint.pdf>

⁷ New York Climate Action Council Scoping Plan, Appendix G <https://climate.ny.gov/resources/scoping-plan/-/media/project/climate/files/Appendix-G.pdf>

⁸ Green Island Hydroelectric Plant, Albany Engineering <https://www.albanysengineering.com/greenisland.htm> ; Green Island Power Authority <https://villageofgreenisland.com/gipa/>

⁹ Green Island Expansion Plans, Village of Green Island <https://villageofgreenisland.com/gipa/expansion-plans/>

(The capacity factor of solar also improves at lower latitudes.) Presently, only a small fraction of the solar and wind projects included in NYPA's draft strategic plan are located downstate.

We do not support the use of state forests, preserves, wilderness areas, wetlands, public conservation lands, or lands protected by conservation easements for solar and wind development. To the extent possible, NYPA should also avoid prime agricultural soils, and wherever possible utilize brownfields and already-developed areas. Unfortunately, many of NYPA's proposed projects appear to impact farmland, forest, and wildlife habitat. For example, one is a giant 449 MW wind project straddling the northern edge of the Adirodacks just south of the St Lawrence River. This could devastate an important north-south flyway for migratory birds between the United States and Canada.

A major problem with the proposed RAPID Act regulations still under review is that they do not consider ecological connectivity and large landscape-level ecosystems that extend beyond the boundary of individual projects. As a public partner with private industry on such projects, NYPA absolutely must. We strongly encourage NYPA to develop policies pertaining to the projects that it supports that exceed the extremely weak environmental criteria proposed pursuant to RAPID.

We note that NYPA wisely extracted itself from the 340 MW Alle-Catt wind project. Based on a single active next site, DEC has estimated that the project would result in the death of 87 bald eagles over its lifetime. It should be noted, however that today there are only about 400 breeding pairs of bald eagles in New York. If thousands of wind turbines are erected upstate like some are demanding, it ought to be clear that extirpation of the species in New York is a real danger. Cumulative impacts need to be considered.

Similarly, large-scale solar projects pose direct and indirect threats to wildlife through habitat loss and the fragmentation of connected ecosystems. This can happen within a project, as with solar arrays that may entirely surround wetlands on a site, and as well as in a larger context that extends beyond project boundaries. This is exacerbated by the piecemeal approval of individual projects without attention to larger ecosystems. Another, perhaps not commonly known example of harm is that large-scale solar projects can look like bodies of water to birds in flight. This creates a hazard, especially for species like the loon, which is a water bird that requires an extended "runway" of water to take off and land. Mistaking a large solar project for water, loons can be injured or find themselves unable to resume flight. We urge NYPA to reexamine the potential ecological impacts of the projects it entertains.

We maintain that the siting of any renewable energy and battery storage projects should be based on a thorough analysis of direct and indirect environmental impacts with attention to the protection of listed species, habitat, biodiversity, and ecological corridors. Based on the amount of renewable capacity proposed and our knowledge of certain projects, we estimate that NYPA's updated draft plan could impact well over 100,000 acres of for solar and wind. Before considering a commitment of public resources to these projects, NYPA should require that such a comprehensive analysis occur.

Relating to this, we reassert our prior comment from last year that NYPA should pursue a full Environmental Impact Statement (EIS). NYPA's plan is an agency action that has the potential to affect land exceeding the State Environmental Quality Review Act (SEQRA) threshold for a Type I action, and therefore requires the completion of a full Environmental Assessment Form (EAF). The threshold for a Type I action includes "a

project or action that involves the physical alteration of 10 acres.”¹⁰ We note that Public Authorities Law § 1005 (powers and duties of NYPA) exempts NYPA's land acquisitions from SEQRA, but the exemption is strictly limited to land acquisitions.¹¹ Nothing in the new Article V enabling legislation authorizing NYPA to develop renewables exempts NYPA from SEQRA.

A Positive Path Forward

NYPA is a respectable institution made of energy expert and engineers who we believe are very cognizant of the fact that New York’s current approach to grid decarbonization faces serious obstacles that will only become worse in the future. As such, we maintain that NYPA is ethically bound to share its concerns and advocate for solutions that are effective.

Diversity is strength, and it will take a diversity of resources—including advanced nuclear power—to decarbonize New York’s electric grid. Needed is an approach driven not by ideological agendas or technology discrimination, but rather one that optimizes public and private resources to achieve the salient goal of greenhouse gas reduction while providing abundant, reliable energy for a robust economy.

If the CLCPA is to succeed, there will have to be compromise. Likewise, NYPA’s leadership and expertise is needed more than ever to forge pragmatic solutions that work. With a rational expansion of solar and wind, and a rational expansion of firm nuclear power, New York can meet its energy goals. Exercising its broad authority and with an eye on the goal of greenhouse gas reduction, NYPA should work to develop the most effective balance of carbon-free resources. The future of New York hinges on its ability to adapt to change and champion a diverse, reliable, and sustainable energy portfolio. NYPA should be a guiding force in that critical transition.

Thank you for accepting these comments and feel free to contact us with any questions.

Sincerely,



Keith Schue
New York Energy & Climate Advocates
keithschue@gmail.com
407-470-9433

¹⁰ New York Codes, Rules, and Regulations, Title 6, NYCRR § 617.4[b][6][i]

¹¹ *“The acquisition and purchase of such land, buildings and equipment by the authority, and any actions taken to effect such acquisition and purchase, are hereby exempt from the provisions of article eight of the environmental conservation law. The application of such exemption shall be strictly limited to the acquisition and purchase of such land, buildings and equipment by the authority and such agreements with the state. Nothing herein shall exempt the authority from otherwise applicable laws respecting the expansion, conversion, operation and maintenance of such land, buildings and equipment.”*



New York Farm Bureau • 159 Wolf Road • Suite 300 • Albany, New York 12205 • (518) 436-8495 Fax: (518) 431-5656

September 11, 2025

New York Power Authority

RE: NYFB Comments on 2025 NYPA Renewables Draft Updated Strategic Plan

To whom it may concern,

New York Farm Bureau (NYFB), the state's largest agricultural advocacy organization, appreciates the opportunity to comment on the 2025 NYPA Renewables Draft Updated Strategic Plan. NYFB recognizes the NYPA's intent to support the state's climate goals by increasing renewable energy infrastructure in the state. With that said, NYFB emphasizes the need to balance energy development with the long-term viability of agriculture, which is a critical economic sector, land steward, and food provider for our state.

NYFB supports the state's continued use of hydroelectric power as a reliable energy source, but NYFB is concerned with the plan's goals to increase the use of renewable energy in the form of solar. Although it is the farmer's right to have solar development on their farmland, NYFB is extremely concerned with the increasing amount of farmland being lost each year to solar development. It is imperative that the NYPA avoid placing large-scale solar projects on prime farmland. Agricultural lands should receive the same or higher protection than wetlands receive for solar installations. NYFB appreciates the statements in the plan regarding avoiding the development of solar on land used in agricultural production and taking into consideration whether the land is within an agricultural district or contains mineral soil groups 1-4. While there have been discussions on the implementation of agrivoltaics, it is important that there is robust research on yield impacts and financial returns along with clear policy on dual land-use without compromising agricultural productivity.

While these considerations will help keep farmland in production, NYFB urges the NYPA to prioritize installing solar projects on non-agricultural lands, such as brownfields and previously disturbed industrial sites. There is plenty of non-agricultural land, including state land, in New York that can be used for solar energy production. The plan includes investing in infrastructure of the state's transmission system. This investment is needed to ensure that the infrastructure can support the increased energy production in all areas of the state.

As the NYPA implements this plan, it is crucial that the increased energy production does not lead to increased energy costs for consumers, including farmers. Already farmers are seeing a drastic increase in their monthly energy bills. If New York farmers are to continue providing locally produced food for communities, then the state must take steps to ensure that the increased use of renewable energy does not negatively impact agriculture in the state.

It is imperative that the state consider the impact on New York agriculture when implementing this plan. Thank you for your time and consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Renée St. Jacques". The signature is written in black ink and is positioned above the typed name.

Renée St. Jacques
Director of Public Policy
New York Farm Bureau

Cc. Ashley Dougherty, NYS Deputy Secretary for Environment and Agriculture
Richard Ball, Commissioner, NYS Department of Agriculture and Markets



On behalf of the NY Renews Coalition’s Steering Committee and more than 380 Member organizations, we thank you for the opportunity to comment on the NY Power Authority (NYPA) Renewables Updated Strategic Plan.

To meet New York’s climate goals, NYPA must build at least 15 GW of public renewable energy by 2030. Increasing the plan to 7 GW is a step forward, but it remains a half-measure in the face of increasing climate devastation. NYPA must double its efforts and build the 15GW that New York needs—at a minimum— to comply with the CLCPA, lower electricity bills, create 25,000 green union jobs, and end our fossil fuel dependence.

As we face life-threatening heat waves, flash floods, skyrocketing energy bills, and an attack on climate action from the federal government, we need NYPA to lead the nation on building public renewables that will slash pollution, make energy more affordable, and protect our planet now. The rapid addition of 4 additional GW of capacity in NYPA’s draft plan update shows NYPA can build even more than the 15GW necessary for us to meet the state’s climate goals.

NY Renews is a multi-sector coalition of 380+ organizations founded following the People’s Climate March, bringing together organizations across New York State to build sustained action for climate, jobs, and justice. The NY Renews coalition championed the Climate and Community Protection Act (CCPA) to mandate a transition to a just and renewable economy in New York State, ultimately becoming the CLCPA. We are dedicated to a just transition away from fossil fuels and toward a renewable energy future that serves the people of New York.

NYPA is uniquely positioned to advance publicly mandated actions in a transparent and equitable manner - as a public power entity - without the constraints of the private sector. Now is the time for New York State to lead - to dramatically scale up our ambition.

The strategic plan must go further by making the following revisions:

- **Continue to increase the total planned capacity to at least 15 GW by 2030.**
 - Ramp up their pace of adding projects and beginning construction to take advantage of Federal solar and wind tax credits prior to their expiration.
 - With IRA credits expiring, NYPA must commit to developing alternative financing methods to bring more renewables online regardless of federal tax credits such as expanded bond financing.
 - Plan at least 5 GW of capacity for the Hudson Valley and downstate New York, with more attention to Distributed Energy Resources (DERs).
 - Minimal proposed capacity is sited on public land or institutions. NYPA should substantially increase the number of such projects, in partnership with the Department of Education, MTA, and NYCHA.
 - Plan additional projects on brownfield sites to turn polluted land to a positive use.
 - Make all projects REACH eligible.
- **Transition Downstate Generation to Renewable and Energy Storage**
 - Commit to building enough downstate generation projects to replace NYPA's methane gas peaker plants by 2030, as required by law. Peaker plants are a public health disaster for host communities, which are already heavily burdened by other polluting infrastructure.
- **Fully decarbonize our public schools**

- NYPA Must take a central role in the effort to fully decarbonize our public schools by siting utility-scale and distributed generation on SUNY and CUNY campuses and building enough capacity to meet their energy demands and related retrofits.
- **Decarbonizing the Capitol and Empire State Plaza**
 - Among the numerous things NYPA can do is to convert the Capitol and Empire State Plaza (ESP) to 100% renewable energy in a few years, as requested since 2017 by the Sheridan Hollow Alliance for Renewable Energy (SHARE). (Comprehensive background information on SHARE and the issue is contained on SHARE's website: <https://sharealbany.org/>.) As SHARE, who works closely with NY Renews has said for years to NYPA, OGS and other state officials, decarbonizing the Capitol and ESP would be: 1) an important step towards the state's efforts to achieve the greenhouse gas emissions targets of the CLCPA, 2) an important signal to private parties that the state itself is committed to climate action (i.e., some private actor might say: "why should I decarbonize quickly when the state itself won't?"); and 3) just as importantly, reverse a decades-long history of doing environmental and health damage to a low-income environmental justice community (Sheridan Hollow and Arbor Hill) due to the presence of (among other things) the state-owned Sheridan Avenue Steam Plant (SASP) in their community. It is totally unacceptable that a state study (known popularly as the Ramboll study) said it will "look at" creating a thermal energy network (i.e. geothermal) after ten years, without a commitment to shut down the SASP or institute geothermal earlier.
 - SHARE has informed us of NYPA's failings in consulting them on a regular basis as representatives of the impacted Sheridan Hollow community as to the work being performed to decarbonize the Capitol. We strongly recommend (assuming NYPA is not doing this already) that the conferral process included a list of points made by commenters along with 1) what actions NYPA is doing to address these concerns;

and 2) if they do not intend to address concerns made by commenters, the reason or reasons why. This is standard practice of state agencies in regard to rulemakings under the State Administrative Procedure Act.

- **Meet the legal mandates in the CLCPA including the Disadvantaged Communities**

- **Investment Mandate**

- NYPA like other Authorities must have a clear plan and reporting to ensure that investments and benefits to disadvantaged communities (DACs) are occurring and are being measured.
- At this time NYPA has not made clear how they will comply with either the Section 7 or Disadvantaged Communities Investment Mandates in the CLCPA - Investment in, and that benefit, designated Disadvantaged Communities should be publicly tracked and exceed 40% of NYPA's program spending.
- Inclusion of the investment and benefits requirement in Section 75-0117 of the Environmental Conservation Law in the CLCPA ("investment and benefits requirement" or "Section 75-0117") was a critical priority of our coalition, and we believe that proper implementation of this provision should be a high priority of the administration.

- **Avoid "False Solutions"**

- Focus on Proven Renewable Energy strategies: Certain technologies and interventions that are often described as "innovative" like hydrogen blending and low-carbon fuels may lead to reduced GHG emissions, but lead to increases in criteria air pollutants, such as NOx. Funding should not be spent on these types of emerging "innovative" technologies that are distractions when full electrification has shown to provide the most benefits. The State should invest in and mass deploy the proven technologies that get us to full electrification and are readily available. For example, the Climate Action Council Scoping Plan states that "switching from fossil

fuels to heat pumps for heating and hot water will immediately and significantly reduce GHG emissions and criteria pollutants from buildings.” Complying with Section 7(3) should be a primary factor in the type of investments we fund with cap-trade-and invest proceeds.

Without these steps NY State will continue to both violate the Climate Law’s legal mandates, and demonstrate the failure of our State to show “Climate Leadership.” It is quite clear New York State is behind in complying with the legal mandates in the Climate Leadership and Community Protection Act (CLCPA). This is not an opinion but backed up by the state’s own data, for example, in the state’s most recent greenhouse gas (GHG) reduction report, and by public statements by the Governor and various state agency officials.

Finally, while technically outside the scope of this public comment process, all activities and functions of NYPA are connected, and thus, we wish to reiterate comments that have already been provided to NYPA by the Tonawanda Seneca Nation Council of Chiefs with respect to allocations of low-cost hydropower sought by tenants at the Western New York Science and Technology Advanced Manufacturing Park (STAMP) mega industrial site in Alabama, New York. To date, NYPA has already allocated 64,900 kW to STAMP tenants - 4,900 kW of Replacement Power to Edwards Vacuum LLC, and 10,000 kW of Expansion Power plus 50,000 kW of Replacement Power to Plug Power Inc.

In an April 28, 2025 letter to NYPA CEO Justin Driscoll, the Tonawanda Seneca Nation requested the following demands, which we hereby reiterate:

- As a courtesy, the Nation requests that NYPA directly inform them directly in the event there are low-cost power allocation requests made for projects at STAMP. Specifically, the

Nation also requests as soon as possible following the submission of an application, the Nation be informed directly in the event that US Stream Data Centers / Project Double Reed applies for a similar exception.

- The Nation voices its strong opposition to any allocation of low-cost hydropower to the proposed US STREAM data center project. This 250 MW project, which would be the largest data center in Western New York, would be sited in Seneca ancestral territory adjacent to and upstream from the Nation's treaty-confirmed Reservation Territory. This project would have profoundly negative impacts on Tonawanda Seneca people, Territory, and environment. Moreover, the project fails to meet NYPA's statutory criteria for low-cost power allocations on the following grounds: 1) Location outside the statutory 30-mile zone; 2) Terrible jobs-to-power ratio; 3) No significant benefits for Western New York; 4) Short Project Lifespan; and 5) Poor job security/stability. Because the STREAM project fails to meet the criteria established by the legislature for allocation of low-cost hydropower, NYPA should reject any application for such power from STREAM.
- Moreover, because the Nation is a disadvantaged community under the Climate Leadership and Community Protection Act ("CLCPA"), N.Y. Env't Conserv. Law § 75-0101, and because the STREAM project would involve emissions from diesel power generation, NYPA must conduct the analysis required by CLCPA § 7(3) before approving any such application for the facility. CLCPA § 7(3) prohibits state agencies from issuing "permits, licenses, and other administrative approvals and decisions" that "disproportionately burden disadvantaged communities."

Submitted on behalf of the Coalition by Stephan Edel, Executive Director (9/12/2025)



VIA ELECTRONIC FILING

September 12, 2025

New York Power Authority
123 Main Street
White Plains, NY, 10601-3170

Re: Comments of New York Solar Energy Industries Association on the NYPA Renewables Draft Strategic Plan

To Whom it May Concern,

New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to provide comments in response to the NYPA Renewables Draft Strategic Plan.

Attached please find our comments. Feel free to contact me if you have any questions.

Thank you.

Jonathan Cohen
Policy Director
New York Solar Energy Industries Association
(631) 897-4189 | jonathan@nyseia.org

COMMENTS OF NEW YORK SOLAR ENERGY INDUSTRIES ASSOCIATION IN RESPONSE TO THE NEW YORK POWER AUTHORITY DRAFT RENEWABLES STRATEGIC PLAN

September 12, 2025

Background and Introduction

New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to comment on the New York Power Authority's (NYPA) Draft Renewables Updated Strategic Plan. As New York confronts rising energy costs and affordability challenges across its communities, distributed solar and storage play a central role in delivering long-term, cost-effective energy solutions for households, businesses, and public institutions.

Private sector developers have built a robust and competitive distributed solar market in New York, helping to reduce energy bills, create local jobs, and expand access to clean energy. NYSEIA's members have demonstrated that, when supported by smart policy and regulatory frameworks, private investment can deliver affordable energy at scale. As NYPA expands its development activity, we urge the Authority to focus on complementing—not competing with—private sector efforts, and to prioritize projects that would not otherwise move forward due to economic or structural barriers.

NYSEIA appreciates NYPA's commitment to co-development agreements and stakeholder engagement. These mechanisms are essential to ensuring that NYPA's market participation is strategic and additive, helping to crowd in private capital rather than crowd it out. We encourage NYPA to continue working closely with private developers to use its platform to advocate for reforms that directly impact affordability—such as interconnection cost certainty, siting reform, and rate design improvements.

Shared Barriers and Opportunities for Reform

NYPA will face many of the same challenges that private developers encounter, particularly around interconnection and siting. Interconnection costs for distributed energy resources have increased dramatically—by a factor of five over the past five years—and restrictive local laws and moratoria continue to delay or block projects. NYSEIA sees a strong opportunity for NYPA to partner with the private sector to advocate for reforms that reduce costs and accelerate deployment.

We urge NYPA to take a more proactive role in addressing the systemic challenges that continue to drive up costs and delay clean energy deployment. Chief among these are the inefficiencies in New York's interconnection process, which require 21st Century technologies and smart grid controls to allow for streamlined and cost-effective grid integration. Developers also face significant financial uncertainty due to unpredictable and escalating interconnection costs. Establishing mechanisms that provide greater cost certainty would help mitigate risk and improve project viability.

In addition, siting remains a persistent barrier, with restrictive local laws and moratoria often stalling projects that would otherwise deliver affordable energy to communities. NYPA is

well-positioned to advocate for reforms that modernize permitting processes and reduce delays caused by outdated or excessively restrictive zoning and land-use regulations.

By engaging in these policy conversations and lending its institutional weight, NYPA can help shape a more efficient and cost-effective development landscape that benefits all stakeholders.

Workforce Development and Collaboration

NYSEIA commends NYPA's investment in workforce development, including its \$25 million annual commitment to training programs. These initiatives are essential to building a skilled clean energy workforce and represent a clear area for collaboration with NYSEIA's member companies, many of which are actively hiring and training workers across the state.

We encourage NYPA to explore joint workforce initiatives with private developers, including apprenticeship programs, regional training hubs, and targeted support for disadvantaged communities. These collaborative initiatives will provide critical, family-sustaining jobs for New Yorkers across the state.

Conclusion

As NYPA moves forward with implementing its Renewables Strategic Plan, NYSEIA encourages the Authority to remain focused on the areas where it can have the greatest impact: enabling projects that face structural barriers, advocating for reforms that reduce cost, and partnering with the private sector to expand access to affordable clean energy.

The private distributed solar and storage industry has demonstrated its ability to deliver cost-effective solutions at scale. NYPA's strategic advantage lies in its ability to unlock opportunities that are out of reach for the private market alone—whether due to land access, financing constraints, or regulatory complexity. By focusing on these high-impact areas, NYPA can achieve additionality while ensuring that the benefits of clean energy reach the communities that need them most.

We urge NYPA to continue building on its collaborative approach—through co-development, workforce partnership, and policy advocacy—and to use its institutional voice to help shape a more efficient, equitable, and affordable energy system for all New Yorkers. NYSEIA stands ready to work alongside NYPA to advance a clean energy transition that is not only ambitious, but also inclusive, cost-effective, and grounded in the strengths of both public and private leadership.



EMILY GALLAGHER
Assembly Member 50th District

THE ASSEMBLY
STATE OF NEW YORK
ALBANY

CHAIR
Commission on
Solid Waste Management
COMMITTEES
Alcoholism and Drug Abuse
Consumer Affairs and Protection
Election Law
Small Business
Transportation

Mr. Justin Driscoll, President and CEO
New York Power Authority
123 Main Street
White Plains, NY 10601-3170

Dear President Driscoll,

Thank you for your ongoing work to increase the amount of public renewables New York is building to address our climate crisis, increase affordability, and strengthen our economy. I write to comment on the New York Power Authority's ("NYPA's") Renewables Updated Strategic Plan Public Comment Draft ("Draft Strategic Plan"),¹ pursuant to a public notice and comment period closing Sept. 12, 2025.² I write to you today to strongly urge NYPA to double the public renewable energy it's planning and commit to building 15 GW by 2030.

The Climate Leadership and Community Protection Act (ch. 106, L. 2019), with its goal of transitioning New York to an energy mix comprising 70% renewables by 2030, remains binding law. Though ambitious, this goal is not impossible: according to recent data, the State of California achieved an energy mix of 67% renewable energy in 2023, up from 41% in 2015.³ Although the California's economy is larger, it's notable that the state achieved this result by expanding renewable energy by 25 GW in the last five years and 7 GW in the last year alone.⁴ The 25 GW of renewable energy added by California in the last five years is less than the 23.5 GW of renewables New York must add to reach its 2030 targets by 2033.

As advocates have stressed, to meet New York's climate goals, NYPA must build 15 GW of public renewable energy by 2030. Increasing the plan to 7 GW is a step forward, but it falls short of what is necessary to meet statutory goals outlined in the CLCPA. The rule of law is essential in our democratic society, and statutory goals cannot be ignored—particularly given the severity of consequences we're facing if we fail to address the climate crisis. To the degree that meeting the goal of an additional 15 GW by 2030 requires additional support in the legislature, I strongly support measures to facilitate that goal.

¹ "NYPA Renewables Updated Strategic Plan Public Comment Draft," *New York Power Authority*, July 29, 2025, accessible online at: <https://www.nypa.gov/-/media/nypa/documents/document-library/renewables/Draft%20NYPA%20Renewables%20Updated%20Strategic%20Plan%20%207292025>.

² "NYPA Press Release: NYPA Publishes Draft of Updated Renewables Strategic Plan, Expanding Renewable Energy Opportunities to Nearly 7 GW of Combined Capacity," *New York Power Authority, Newsroom*, accessible online at: <https://www.nypa.gov/news/press-releases/2025/20250729-strategic-plan>

³ <https://www.gov.ca.gov/2025/07/14/in-historic-first-california-powered-by-two-thirds-clean-energy-becoming-largest-economy-in-the-world-to-achieve-milestone/>

⁴ <https://www.gov.ca.gov/2025/06/04/new-data-shows-california-is-adding-more-clean-energy-capacity-to-the-grid-faster-than-ever-before/>

The Public Service Commission’s “Order Adopting Clean Energy Standard Biennial Review As Final and Making Other Findings,” effective May 15, 2025, as well as NYPA’s Draft Strategic Plan explain the various obstacles standing in the way of more ambitious renewable energy investments—including a challenging and tumultuous federal regulatory environment, higher interest rates, procurement uncertainties caused by tariffs and other exogenous factors, and necessary transmission upgrades—but the economics of renewable energy have not fundamentally changed. Renewable energy investments produce greater yields for investors over time than fossil fuel investments⁵ (clean energy expansion accounted for a third of the EU’s GDP growth in 2023)⁶ and global investment in renewable energy assets continues to reach record levels, despite a 36% slump in the United States this year.⁷

I ask that NYPA double its efforts and commit to building no less than 15 GW in its next adopted strategic plan. Each year brings new evidence to bear on the externalized costs consumers and the public face caused by climate change and continued reliance on fossil fuels, from disastrous floods, to deaths caused by ever-worsening heat waves, to spiraling home insurance costs and utility bills. The economic potential of increased renewable energy investment is massive: reliable, clean and abundant clean energy decreases the cost of doing business and the cost of living in New York, which are essential to the continued vitality of the state’s economy and the general welfare of our communities. Improved air quality and decreased pollution dramatically benefit the public health and slow the impact of climate change, which poses grave threats to our way of life.

I echo the specific recommendations made by Public Power of New York, and add that my district, Assembly District 50, contains one of NYPA’s peaker plants, the Kent natural gas plant, constructed in 2001. I understand that NYPA has issued an RFI for conversion of this site to other uses, and that NYPA plans to decommission its peaker plants where doing so would have no adverse impact on air quality or community health. I support the decommissioning of this site at the first available opportunity and its conversion to utility-scale battery storage, public green space, and/or permanently affordable housing, should NYPA receive suitable offers.

Thank you again for your partnership in addressing this critical issue and making New York a leader in this space.

Best,

A handwritten signature in black ink that reads "Emily Gallagher". The signature is written in a cursive style with a horizontal line underneath the name.

Assemblymember Emily Gallagher
District 50

⁵ <https://ccsi.columbia.edu/sites/ccsi.columbia.edu/files/content/docs/publications/ccsi-renewable-energy-investment-roadblocks-drivers.pdf>

⁶ <https://www.iea.org/commentaries/clean-energy-is-boosting-economic-growth>

⁷ <https://about.bnef.com/insights/clean-energy/global-renewable-energy-investment-reaches-new-record-as-investors-reassess-risks/>



ROBERT CARROLL
Assemblymember 44th District

THE ASSEMBLY
STATE OF NEW YORK
ALBANY

CHAIR
Committee on
Libraries and Education Technology

COMMITTEES
Corporations, Authorities and
Commissions
Election Law
Environmental Conservation
Tourism, Parks, Arts and
Sports Development

Comment Submitted by Assemblymember Robert Carroll
New York Power Authority Renewables Updated Draft Strategic Plan
September 10, 2025

The Build Public Renewables Act, which I was the prime sponsor of in the Assembly, was born out of the recognition that without a greater public sector role in the renewable energy sector, the State was very unlikely to meet the Climate Leadership and Community Protection Act goal of 70% renewables by 2030 as well as emission reduction targets.

NYPA is to be commended for increasing the projected build-out of projects from 3 GW of renewable energy capacity in its first draft strategic plan to 7 GW in the updated plan. NYPA's commitment to energy storage projects as part of the plan is encouraging, although environmental justice concerns must be taken into account in terms of the distribution of potential projects.

While the expanded plan is welcome, given the Trump Administration's hostility towards renewable energy and its promotion of fossil fuels, it is imperative that NYPA be as ambitious as possible and build 15 GW of new capacity by 2030. NYPA will especially need to be innovative in its collaboration with NYSERDA as well as with other public entities such as SUNY, CUNY, the MTA, ESC, NYC EDC, and NYC DOE, and NYCHA to identify and build projects.

Clearly, NYPA will need robust support from the State to fulfill BPPA mandates and the Governor and the legislature must step-up and direct necessary resources to NYPA and the cause of renewables. The consequences of failing to do everything we can to address climate change will unfortunately become more and more dire.

Testimony to
The New York Power Authority

On Increasing Capacity for Renewable Energy to 15 GW

By State Senator Kristen Gonzalez

9.12.2025

CHAIR:
ELECTIONS
INTERNET AND TECHNOLOGY

COMMITTEES:
CHILDREN AND FAMILIES
CIVIL SERVICE AND PENSIONS
CONSUMER PROTECTION
ENERGY AND TELECOMMUNICATIONS
HEALTH



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SENATOR KRISTEN GONZALEZ

59TH SENATORIAL DISTRICT
STATE OF NEW YORK

My name is State Senator Kristen Gonzalez and I represent a waterfront district that covers Western Queens, North Brooklyn, and the East side of Manhattan. My constituents know all too well the costs of inaction on climate change. From flooding devastation to rising electricity costs, to pollution from nearby fossil fuel generating facilities, my district is at the forefront of the climate crisis.

According to the Climate Leadership and Community Protection Act (CLCPA), which passed in 2019, we must achieve a 40% reduction in greenhouse gas emissions by 2030 and an 85% reduction by 2050, with a transition to 100% zero-emission electricity by 2040. We knew that in order to meet those goals, we need our government to step in and step up, building 15 GW of public renewable energy by 2030. That's why one of my first priorities upon entering office in 2023 was helping to pass the Build Public Renewables Act.

I'm glad to see that NYPA has committed to increasing the plan to 7 GW, but in the face of increasing climate devastation, NYPA must commit to building the full 15 GW that New York needs. If we don't act quickly to decrease emission and achieve, it's not just future generations that will pay the price, it is New Yorkers here and now.

That's why I'm calling on NYPA to make the following revisions to the strategic plan:

- Continue to increase the total planned capacity to at least 15 GW by 2030.
- Ramp up their pace of adding projects and beginning construction to take advantage of Federal solar and wind tax credits prior to their expiration.
- With IRA credits expiring, NYPA must commit to developing alternative financing methods to bring more renewables online regardless of federal tax credits such as expanded bond financing.
- Plan at least 5 GW of capacity for the Hudson Valley and downstate New York, with more attention to Distributed Energy Resources (DERs).
- Minimal proposed capacity is sited on public land or institutions. NYPA should substantially increase the number of such projects, in partnership with the Department of Education, MTA, and NYCHA.
- Plan additional projects on brownfield sites to turn polluted land to a positive use.

CHAIR:
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SENATOR KRISTEN GONZALEZ

59TH SENATORIAL DISTRICT
STATE OF NEW YORK

- Fully decarbonize our public schools by siting utility scale and distributed generation on SUNY and CUNY campuses and building enough capacity to meet their energy demands and related retrofits.
- Make all projects REACH eligible.
- Commit to building enough downstate generation projects to replace NYPA's methane gas peaker plants by 2030, as required by law. Peaker plants are a public health disaster for host communities, which are already heavily burdened by other polluting infrastructure.

We cannot back down from our climate goals because they are law not suggestions. Now is the time to double down on doing everything in our power to reduce carbon emissions, combat climate change, and save lives.

Sincerely,

Senator Kristen Gonzalez

September 12, 2025

The Honorable Kathy Hochul
Governor of New York State
NYS Capitol Building
Albany, NY 12224

New York Power Authority Board of Trustees
123 Main Street
White Plains, NY 10601

Re: New York Power Authority Updated Renewables Strategic Plan

Dear Governor Hochul and the NYPA Board of Trustees,

Scenic Hudson is a 501(c)(3) organization based in Poughkeepsie, New York, and has been an environmental crusader for the Hudson Valley since 1963. With over 25,000 ardent supporters across 10 counties, we are the largest environmental group focused on the Hudson River Valley. Our team of experts combines land acquisition and citizen-based advocacy to create environmentally healthy communities, champion smart economic growth, increase public access to nature, support sustainable agriculture, and preserve the Valley's inspiring beauty and natural resources for generations to come.

As part of our mission, Scenic Hudson advocates for increased adoption of renewable energy sources. Reducing greenhouse gas emissions by transitioning to renewables is critical to addressing the existential threat that climate change poses to the Hudson Valley's people, places, and future. To that end, Scenic Hudson's work to support the deployment of renewables in the Hudson Valley and beyond has included advocating for smart renewable energy policy locally and on the state level; creating land-conscious mapping tools to guide the responsible siting of solar energy infrastructure; and convening with renewable energy project developers to ensure development proposals are protective of environmental resources.

In 2023, the Build Public Renewables Act (BPRA) became law, authorizing the New York Power Authority (NYPA) to build and own renewable energy projects, including solar and wind projects, battery energy storage systems (BESS), and thermal energy networks.¹ To the extent that the State determines it is unlikely to meet the renewable energy goals laid out in the Climate Leadership and Community Protection Act (CLCPA), the BPRA instructs NYPA to step in and identify renewable energy projects that would ensure that New York achieves those goals.² To fulfill the goals of the CLCPA, New York must generate 70% of its electricity from zero-emission sources by 2030. Despite significant progress, the State is on track to fall well short of that 70% goal.³ Longer-term emissions-free energy projects like the recently proposed upstate nuclear power facility are not likely to come online for a decade or more, making NYPA's role in developing renewable energy even more critical.

¹ Public Authorities Law § 1005(27)(g)(vi)

² Public Authorities Law § 1005(27-a.)(d)

³ PSC and NYSERDA, Draft Clean Energy Standard Biennial Review (July 1, 2024), 55-57.

On October 8, 2024, NYPA issued its Draft Renewables Strategic Plan, which provided an initial plan for operationalizing NYPA's renewables mandate. The Draft Plan identified 40 potential projects amounting to 3.5 GW of total capacity, which NYPA indicated were just the "first tranche of projects" with additional projects to come. In light of the short time frame and vast expansion of NYPA's responsibilities, this initial project list represented a very impressive start. On December 9, 2024, Scenic Hudson submitted comments on the Draft Plan commending NYPA on its quick work while also encouraging NYPA to continue expanding its development efforts as necessary to ensure that New York achieves its goal of generating 70% of electricity from zero-emissions sources by 2030.

On July 29th, 2025, NYPA issued the Renewables Updated Strategic Plan, which represents very significant and laudable progress on the Draft Plan. Specifically, the Updated Strategic Plan outlines 24 additional renewable energy projects across the state, bringing the total project portfolio to almost 7 GW of distributed electricity generation. Once again, Scenic Hudson commends NYPA on this immense progress and all of the hard work that went into accomplishing it. Given the fact that New York is still projected to fall well short of its climate goals, however, Scenic Hudson strongly encourages NYPA to continue expanding its project list.

Scenic Hudson is also pleased to see additional projects proposed for the Hudson Valley. With high energy demand in the Hudson Valley and proximity of the region to New York City, we encourage NYPA to continue to seek opportunities in the region. Community members in the Hudson Valley can benefit immensely from the job opportunities, economic development, electricity price relief, and pollution reduction that result from renewable energy development. Additionally, the Hudson Valley's low- and moderate-income ratepayers would benefit from the REACH program, as the cost of electricity continues to rise in the region.

Through its deep experience, flexibility, access to low-cost capital, and workforce development funding, NYPA has the tools to take on a critical role in New York's energy transition in a land- and community-conscious manner. As NYPA continues to find cost-effective and expeditious opportunities to deploy renewables in pursuit of CLCPA goals, we urge NYPA to focus on developing projects in ways that avoid, minimize, and mitigate impacts to natural resources and maximize benefits to host communities. Projects that avoid deleterious effects on New York's irreplaceable natural resources and scenic beauty and are responsive to neighboring residents will minimize local opposition to projects, build public support for renewable energy development generally, and expedite permitting processes. To that end, NYPA should:

- Prioritize development on previously disturbed lands such as brownfields, greyfields, mines, landfills, highway rights of way, and former fossil fuel plants, especially on state-owned lands;
- Avoid prime agricultural soils to the extent possible or co-locate projects with ongoing agricultural operations through agrivoltaic projects;
- Protect ecological resources such as wetlands, streams, core forests, and preserved open spaces, all of which provide critical public benefits such as wildlife habitat, water filtration, and carbon sinks; and
- Use best practices in construction and operation to minimize impacts on natural resources and host communities (e.g., native plantings to screen solar developments) and reduce embodied carbon in all installations, making them as "green" as possible.

For future projects located within the Hudson Valley, we urge NYPA to utilize Scenic Hudson's Solar Mapping Tool to ensure that the factors outlined above are addressed in the planning process.⁴

Extending the legacy of the BuildSmart program, the NYPA-led Decarbonization Leadership Program is helping to develop decarbonization action plans for the State's top 15 highest carbon-emitting State facilities by January 31, 2026. The action plans for these facilities, based on the Decarbonization Leadership Program for the Empire State Plaza, are an excellent demonstration of state capacity to achieve decarbonization goals.

Scenic Hudson believes that NYPA can expand on its successes working with state agencies by developing additional projects on state-owned sites, particularly on previously disturbed land. We encourage NYPA to leverage its relationships with state agencies through a Statewide effort to catalogue state-owned disturbed sites suitable for renewable energy projects. In this manner, sites like vacant land on NYSDOC correctional facilities, NYSDOT garages, Thruway Authority highway medians and cloverleaves, and other state-owned disturbed sites can host energy-generating projects that simultaneously minimize land acquisition costs and natural resource impacts.

In addition, we encourage NYPA to work with other stakeholders in public, private, non-profit, and academic institutions to explore and demonstrate new and alternate technologies which may further strengthen and accelerate the transition away from fossil fuels to sustainable energy generation, storage, and transmission.

Over the next several months, federal support for wind and solar development will be phased out. Therefore, NYPA should move as quickly as possible to begin construction on as many wind and solar projects as feasible to secure that support. As the window to receive federal support closes, the economics of wind and solar projects in New York will become more challenging, and NYPA will be uniquely well positioned to build those projects. Therefore, NYPA should continue acting with urgency to build out renewable energy projects throughout the state, step into its role as a leader in New York's energy transition, and emerge as a model for the rest of the country.

Once again, Scenic Hudson commends NYPA on the substantial progress towards New York's renewable energy future that it has laid out in the Updated Renewables Strategic Plan. We also encourage NYPA to continue expanding its renewable energy portfolio as needed to assure that New York meets its climate goals. We look forward to continued conversations with NYPA as it furthers its leading role in responsible renewable energy development across New York State.

Sincerely,

David Chernack

David Chernack
Environmental Advocate
Scenic Hudson

⁴ Scenic Hudson, Solar Mapping Tool, <https://www.scenichudson.org/our-work/climate/renewable-energy/welcome-to-scenic-hudsons-solar-mapping-tool/> (accessed December 9, 2024).



September 12, 2024

VIA EMAIL AND ONLINE SUBMISSION

New York Power Authority

Email: nyparenewablesconferral@nypa.gov

URL: <https://publiccomments.nypa.gov/form>

Comments of Sierra Club Regarding NYPA Updated Renewables Strategic Plan:

The Sierra Club respectfully submits these comments regarding the New York Power Authority’s (“NYPA”) July 29, 2025 Renewables Updated Strategic Plan (“Updated Plan”). As set forth in Sierra Club’s December 9, 2024 comments, Sierra Club is supportive of NYPA’s efforts to accelerate the deployment of renewable energy in New York to further the State’s efforts to achieve the Climate Leadership and Community Protection Act’s (“CLCPA”) renewable energy mandates and to provide access to the benefits of clean, renewable energy, to low- and moderate-income New Yorkers. Sierra Club welcomes the increased ambition of the Updated Plan, which incorporates energy storage procurement and raises NYPA’s goals for renewable energy and energy storage procurement from 3.5 GW to nearly 7 GW. The increase in ambition is timely giving impending CLCPA clean energy deadlines and the adverse actions toward renewable energy taken by the current federal administration. Sierra Club hopes NYPA will move quickly to advance these renewable and storage projects, which will significant assist in achieving the CLCPA’s 70 percent renewable by 2030 mandate.

In its comments on NYPA’s initial Strategic Plan, Sierra Club urged NYPA to “expand its clean energy procurement to include renewable energy and energy storage projects that will facilitate the expeditious retirement of the facilities in its fossil fleet to reduce the pollution burden on residents of affected communities.”¹ In May 2025, NYPA published its Small Natural Gas Power Plant Transition Plan (“Transition Plan”).² In its Transition Plan, NYPA explained that, as of April 2025, it has signed four term sheet agreements with developers for energy storage facilities and was negotiating a fifth agreement to lease small plant sites for battery storage development.³ NYPA also explained that it has been working to build a direct current high voltage transmission line—Clean Path New York—that would transmit renewable energy from Upstate New York into New York City in order to reduce Downstate reliance on fossil fuel generation.⁴ Sierra Club joined numerous stakeholders in supporting NYPA’s petition to have

¹ Comments of Sierra Club Regarding NYPA Renewables Strategic Plan (Dec. 9, 2024), at 1 (“Sierra Club Strategic Plan Comments”).

² NYPA, Small Natural Gas Power Plant Transition Plan (May 2025), available at <https://www.nypa.gov/-/media/nypa/documents/document-library/renewables/sngpp-transition-plan.pdf>.

³ *Id.* at 3.

⁴ *Id.*

the Clean Path line designated as a Priority Transmission Project,⁵ and is disappointed that the Commission recently denied NYPA's petition.⁶ Sierra Club applauds NYPA's efforts to use energy storage and renewable energy procurement as a strategy to address localized grid needs created by the retirement of its small natural gas plants, and urges NYPA to continue to advance transmission projects that will bring additional renewable energy into the New York City area and help alleviate pollution burdens on communities near existing fossil plants.

Sierra Club additionally endorsed NYPA playing a gap-filling role in renewable development in New York State, and identified types of projects NYPA should explore supporting.⁷ An additional area where NYPA's engagement could be valuable is in boosting solar development on Long Island. With offshore wind projects facing significant hurdles under the current federal administration, development of clean on-island generation—along with transmission projects like Clean Path New York—will be critical to obviating the need for the aging fleet of fossil fuel power plants whose contracts with PSEG-Long Island will soon be up for renewal. The Nature Conservancy and Defenders of Wildlife have developed a Long Island Solar Roadmap that identifies opportunities to advance mid- to large-scale (250 kW and above) solar projects on Long Island in a way that minimizes environmental impacts.⁸ The Roadmap identifies 19.5 GW of low-impact solar siting opportunities on the island.⁹ In addition to other gap filling opportunities, Sierra Club urges NYPA to work with LIPA and renewable developers to advance these timely and critical projects.

Thank you for your consideration.

Respectfully submitted,



Joshua Berman
Senior Attorney
Sierra Club
50 F St. NW, 8th Floor
Washington, DC 20001
Tel: (202) 650-6062
Email: Josh.Berman@sierraclub.org

⁵ Comments of NYLCVEF, Citizens Campaign, New Yorkers for Clean Power, NRDC, Urban Green, Sierra Club, Environmental Advocates NY, and Earthjustice regarding Petition Requesting Designation of Certain Transmission Investments as a Priority Transmission Project, Case No. 20-E-0197 (Apr. 21, 2025).

⁶ Order Denying Petition, Case No. 20-E-0197 (Aug. 14, 2025).

⁷ Sierra Club Strategic Plan Comments at 2.

⁸ The Nature Conservancy & Defenders of Wildlife, Long Island Solar Roadmap: Advancing Low-Impact Solar in Nassau & Suffolk Counties (Mar. 2021), available at https://www.nature.org/content/dam/tnc/nature/en/documents/LongIslandSolarRoadmapReport_2020_HighRes.pdf.

⁹ *Id.* at 7.



Stop Energy Sprawl comments on NYPA draft Strategic Renewables Plan

September 12, 2025

Stop Energy Sprawl

Stop Energy Sprawl (SES) is a statewide coalition representing communities in New York State targeted by and opposed to land-wasting and coast-endangering large-scale wind & solar projects typically located far from where that energy is needed. Ours is a coalition of over fifty associated entities including local governments, community groups, elected officials and professionals. Several of the projects that the Power Authority of the State of New York (NYPA or “the Authority”) is currently considering are actively opposed by coalition communities. We number several Town Supervisors, County representatives, Attorneys, and Planning Board members, all representing larger constituencies from several hundred to many thousands.

The core of our coalition are the grassroots community groups working to preserve the farmland, forest, agriculture, tourism and historic heritage of their regions and keep industrial wind and solar from bringing economic and environmental ruin and irreversible damage to the soul of their communities. Coalition organizations stretch from Niagara County and the Southern Tier through the Mohawk and Hudson Valleys and into Long Island and have been active both locally and statewide.

Stop Energy Sprawl is a grassroots organization, consisting entirely of volunteers with no corporate funding or sponsorship. Several of our local groups are quite large and can number 200 members or more. At least two of our affiliated groups include Amish gentlemen among their members, a demographic apparently missing from any of NYPA's past outreach efforts.

Many of our coalition members have participated in the "Public Hearings and Public Comment Process for the Inaugural NYPA Renewables Strategic Plan" and many also participated in the earlier held Conferral Process. We have taken the opportunity to highlight several examples of these comments and gathered them in an addendum below. Though differing in emphasis and specific details, all coalition members stress a need for NYPA to stay grounded in reality and to keep the genuine interests of New Yorkers to heart.

Electricity Must Be Reliable & Affordable

New Yorkers need reliable and affordable electricity, something that only can be done with firm generation. Luckily, as many of our members mentioned, NYPA is an expert in this field, as it has successfully operated hydroelectric, nuclear, and transmission resources for many decades. As the search for Dispatchable Emission Free Resources (DEFERs) and the 2040 climate goals come to the forefront, the State should tap into this expertise of NYPA's for the benefit of all New Yorkers.

New Yorkers want true environmental protection. As our members have pointed out, clearing millions of acres of farms, forests, and wetlands to put up intermittent wind turbines and solar panels is antithetical to the principles that some "environmentalist groups" claim to uphold. NYPA should take land use into consideration and do its best to minimize the damage to the State's natural resources.

Finally, New Yorkers need their rights respected. Though Home Rule is guaranteed in New York's constitution, State agencies like NYSERDA and ORES have plowed over communities in an attempt to reach the State's unreachable climate goals. NYPA should strive to not become another State agency scorned by Upstate communities. Already, based on the first round of projects listed, there is worry amongst our members that NYPA will become a bailout fund for unprofitable and unpopular projects that otherwise would have pattered out and gone away.

At a minimum, as poignantly pointed out by one of our members, NYPA should accurately list the projects it intends to fund using correct categorization and the real names of existing projects (not E-1, E-2 etc.). At a maximum, NYPA should get real community input from where projects are actually located and take past rejections into account.

The Plan

The Authority has failed to put forth a feasible, reliable, and cost-effective plan. In addition, it has failed to effectively garner input from those communities most adversely-impacted by the draft plan. Lastly, the choice of its inaugural tranche of projects leaves Stop Energy Sprawl with many questions.

We echo Roger Caiazza, author of the Pragmatic Environmentalist blog, who writes, "the Draft Plan should be paused until completion of a comprehensive feasibility analysis outlining how issues raised in these comments and elsewhere can be addressed without affecting the mandate for reliable and affordable electric energy." Mr. Caiazza and others have listed multiple reasons to question the feasibility of this plan, as well as New York's overall approach towards generating power while emitting fewer (and eventually zero) greenhouse gases.



First among these is that proliferation of large-scale wind & solar will not eradicate fossil-fuel based power plants. The limited amount of storage included in NYPA's plan does not make up for the intermittent nature of wind & solar. Intermittency perpetuates use of fossil-fuel based power plants, including peaker plants. In a realtime grid, these peaker plants are the dispatchable resource that grid managers call upon to keep the lights on when wind or solar are unavailable due to atmospheric conditions and when storage is depleted.

Further, our grid must be robust and flexible to handle extreme weather events. Large-scale wind & solar generation are extremely vulnerable to violent weather events such as hail, ice storms, tornados, and hurricanes. However, other extended weather conditions such as multi-day wind lulls and periods of extended solar underproduction (including New York winters) require a diverse set of solutions that will keep the power flowing. Rather than abandoning reliable baseload power in favor of intermittent, weather-dependent generation, NYPA should perform an in-depth feasibility analysis to determine the best strategy for achieving a carbon-free grid. Such an analysis is long overdue, and the Plan should be paused until it is complete.

Another set of concerns revolves around the objectives of delivering power to where its needed, the long-term financial cost to ratepayers and taxpayers, and the sacrifice of our forests and farmland (and their economic value to targeted communities) that would result from the proposed plan. CleanPATH has been cancelled due to mutual agreement between the company and NYSERDA. Nearly all of the solar projects in NYSERDA's Tier 1 Large-Scale renewables solicitation from 2020 onward were cancelled and rebid at significantly higher costs to New Yorkers. NYPA itself tells us in the draft plan that it is looking to partner with "struggling" companies that already have pipeline projects. Are these truly conditions that augur success for NYPA's draft plan?

Integrating solar and wind into the electric grid actually becomes more difficult as the proportion of intermittent generation increases. Substantial engineering and design are needed to transition the grid from one that is dependent on synchronous machines to one that is based on inverters. Simply adding more wind and solar capacity without addressing the ancillary support needed to integrate it into the grid is not acceptable. The fact that New York is already experiencing major obstacles at this early stage should be a strong indicator that such a strategy, and consequently, NYPA's draft plan, is fundamentally flawed.

Regarding transmission, any energy that is produced in an area that is already replete with carbon-free electricity will be wasted unless it can be delivered to those areas reliant on fossil-fuel. The energy that is transmitted will be subject to some additional loss during transmission. CleanPath was one project designed to help alleviate one of the many bottlenecks that exist between targeted communities and the communities with high electrical need. Without it, NYPA's focus on a tranche of projects that are largely located in areas that have already attained 90% carbon-free generation is a misuse of NYPA's credit and capital. Further, the additional monetary and environmental cost of creating new transmission lines exacerbates the damage to New Yorkers.



This is further exacerbated when one considers that the many Tier 1 solar and high-profile wind projects were cancelled due to costs rising at such a rate that developers decided that their original bids were no longer economically viable. Supply chain issues, increasing demand and inflation have all been blamed. While there has been some easing on inflation, supply chain issues and demand – both driven by governmental caveats like the NYPA plan – will continue. NYPA's financial firewalls as outlined in the draft plan may not be sufficient to protect the Authority from such an unstable market. Growing price pressure is evident in the 2023 Tier 1 awards wherein NYSERDA awarded a median REC strike price of \$99 per megawatt hour across the awarded projects. NYSERDA has failed to publish the pricing for its 2024 Tier 1 solicitation and has indicated that it will not do so until the projects are completed.

Lastly, there is the lifetime feasibility of these facilities. Other carbon-free generating technologies are much longer-lived and require much less material to construct and maintain. Dennis Fitzgerald's striking analysis compares several factors between a 4.5 GW carbon-free nuclear facility and equivalent amounts of wind and solar electric generation. With an average life of 20 - 25 years, solar panels and wind turbines would need to be totally replaced 3 to 4 times during the lifetime of an equivalent nuclear facility at a cost of 4 to 5 times that of the nuclear facility. Such an expense is unsustainable for both our State's economy and the environment. Cumulative land use impacts must be considered, not only for the siting of large-scale solar and wind, but also for the probable land-fill disposal of old solar panels and discarded turbine blades. On top of this, batteries that accompany intermittent solar and wind – which typically last only ten years – constitute a huge disposal nightmare that the State has not even begun to consider.

Inadequate Public Outreach

Last year, we brought forth our concern that NYPA's public hearings for the draft Renewables Plan were failing to reach those communities that would be most adversely affected by the buildout of the tranche of projects that NYPA has outlined, as illustrated below. The people living and working in the mostly rural communities targeted for so many of these projects are voices that NYPA needs to hear.

NYPA congratulated itself on conducting a dozen public hearings – two a day in five different physical locations as well as a virtual day with two additional times. However the locations for these hearings were almost entirely untethered from the locations of the projects named in NYPA's initial tranche, conveniently sidestepping the concerns and voices of those New Yorkers and their communities that are most likely to be adversely affected by the plan. The map below identifies the physical locations of the hearings on NYPA's project map from the draft plan. The communities whose forests and farmlands will be sacrificed and who would suffer the most impactful corresponding economic loss from large-scale projects are unrepresented.



In this latest draft plan, the number of projects has increased, but the depth and breadth of NYPA's public outreach has contracted. The same areas ignored last year by NYPA are again excluded from meaningful commentary. NYPA had an opportunity to correct their flawed public hearing strategy this year, but chose instead to rely solely on virtual hearings, a decision that will doubtless provide a skewed commentary. It excludes those who shun technology for personal or religious reasons, the elderly whose technology skills are limited, the rural poor who often cannot afford or cannot access quality broadband or large data cell plans and those who live in areas poorly-served by cell or broadband service. Many of these people live in Climate Justice Workgroup-identified DACs and their communities are strongly opposed to some of the projects included in NYPA's set of projects.

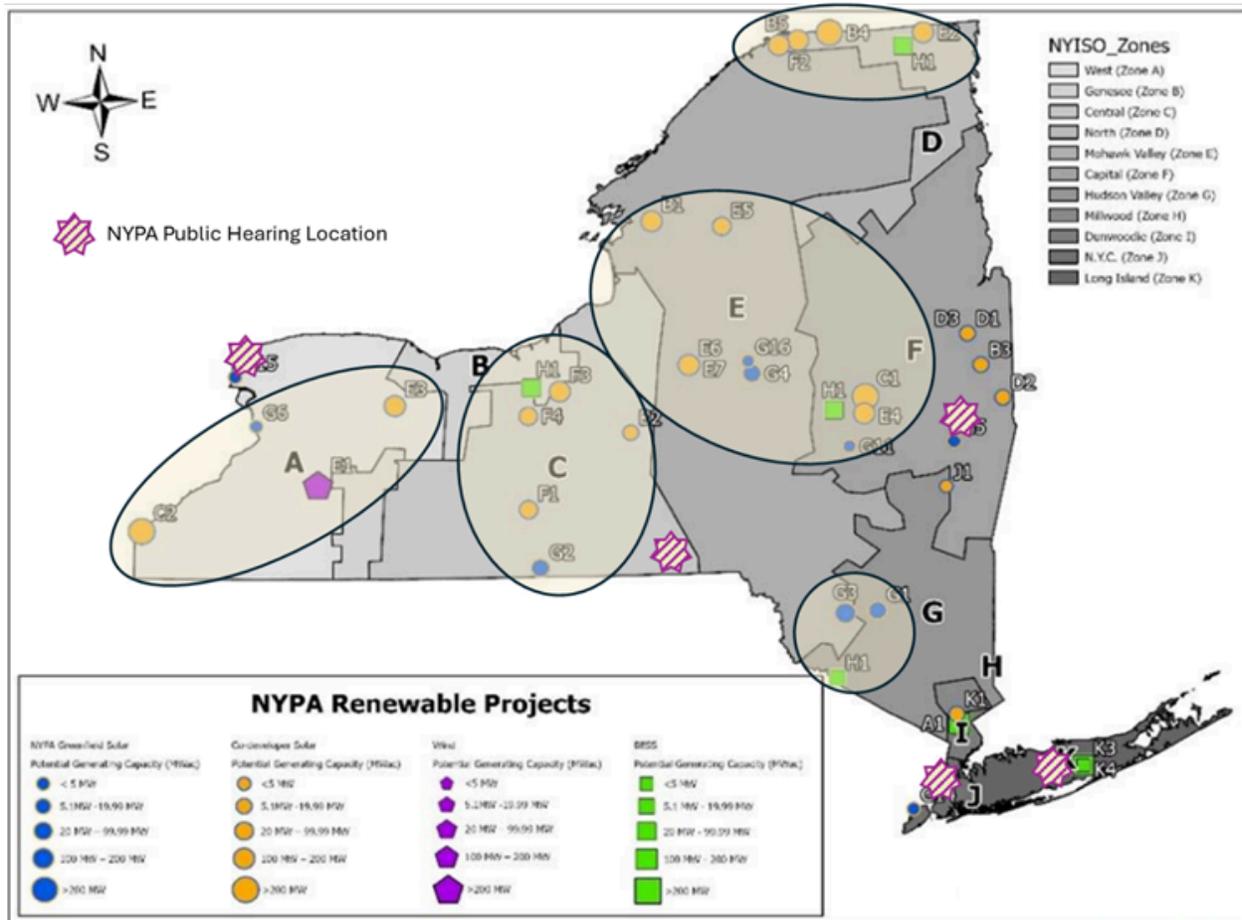


Figure 1: NY Power Authority's Initial "Tranche" of projects for 2025 from its October 8, 2024 draft Strategic Renewables Plan with areas of significant development highlighted demonstrating the inadequacy of NYPA's in-person hearings



Some may argue that the virtual hearings provided sufficient opportunity for these primarily rural communities to be heard. Such an argument fails in light of the large number of residents in these areas who have insufficient access to virtual meeting technology or who because of age or religion are not facile with these tools and therefore unable to participate in a virtual hearing.

Access to communications technology is still poor in the rural areas of New York. As an example, parts of southern Montgomery County regularly experience poor cell reception and land-line outages, including internet service, that have lasted for weeks. Similar issues are reported in Herkimer Count and other areas around the State. Additionally, in many parts of Upstate New York, there has been an influx of Amish families, attracted by our rich soils, and reasonable land prices. They do not utilize on-line meeting services, but do attend the community meetings about wind & solar and local actions that affect their communities. Lastly, many rural communities have a high percentage of elderly who are unfamiliar or unskilled with internet meeting technologies.

The failure of NYPA to pursue public hearings in at least a representative sample of these communities results in an incomplete and inaccurate record, where the voices of those seeking to prop up the wind & solar industry are overstated. Many of the projects in NYPA's initial tranche are in Disadvantaged Communities (DACs). NYPA repeats the erroneous misconception that the construction of wind and solar facilities will be helpful to these communities. They are not a benefit, as many of our associates have spoken to. NYPA should make the opportunity to gather additional input by conducting public hearings in impacted communities and revisit this plan based on community input prior to moving forward.

As noted earlier, NYPA has chosen to potentially partner with companies on projects well-known to many of the community organizations and municipalities that comprise the Stop Energy Sprawl coalition. These projects are often seen as attempts by State agencies, bolstered or directed by misinformed legislation to transform targeted communities into energy colonies for portions of the State with few carbon free energy sources of their own. The companies and their State supporters promise all sorts of advantages, but instead strain local government budgets and community organizations by forcing them to hire legal and engineering experts just to make sure that the municipality has a chance at equitable treatment.

Some of the comments provided have noted that NYPA may need to review the wisdom of its choices for potential partners. Stories abound about developers making deals with local municipal officials and land agents claiming that the project is a "done deal," to try and convince holdout landowners to lease or sell their lands. Cattaraugus County Legislator Ginger Schroder's comments that an Attorney General Investigation increased the number of potential conflicts from an initial two to a total of thirteen in 2023 is especially troublesome. Stephen Helmin tells us that the project support in his community is nearly exclusive to persons with a financial interest or their family members. This is a common pattern of behavior witnessed by many of our coalition members and will be a tremendous challenge for NYPA if it were to become involved in such divisive and unpopular projects. NYPA's inaugural tranche is a



minefield and additional vetting beyond its “due diligence” is warranted – yet another reason that the plan should be paused.

Editorial Note

Please note that individual comments from other persons and entities in our coalition have been included following these initial remarks. We were not able to include all the insightful points made by our coalition affiliates in this initial section. We implore the reviewers of this document to carefully read these subsequent comments. Please note that some of these comments include discussion of NYPA’s original Draft Strategic Renewables Plan. Inasmuch as many of the issues associated with that first plan have reappeared or were inadequately addressed in this update, we have included these to provide additional guidance to the Authority.

Thank you for taking the time to review these comments. We at Stop Energy Sprawl are hopeful that NYPA's background in running a real working grid will allow it to navigate the unrealistic and risky expectations with which it has now been burdened. However, because of the issues we have highlighted, we believe that the most prudent course is for NYPA to pause and / or rework this draft plan. Regardless, NYPA should work with the NYISO and other regulators to create an action plan that recognizes and corrects for the tipping point where the rollout of large-scale wind and solar endangers the reliability of the grid and the concomitant safety of New Yorkers vulnerable to extended power outages. NYPA and New York State should pursue a plan that is workable, prudent, and reliable without risking NYPA’s core capabilities or financial well-being. This plan fails, once again, to meet that criterion.

Stop Energy Sprawl

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September 12, 2025



Comments from Stop Energy Sprawl Coalition Members & Colleagues

Roger Caiazza

Caiazza Comments on Draft 2025 NYPA Renewables Strategic Plan

The 2023-24 enacted State Budget authorized and directed the Power Authority of the State of New York (NYPA) to engage in the largest expansion of the Authority's responsibilities in decades to [advance renewable energy](#) and support other state priorities. The 2025 [Draft NYPA Renewables Strategic Plan](#) (Draft Plan) is the second edition of an outline approach for developing new renewable energy generation projects to supply New Yorkers with "affordable, reliable, emission-free electricity".

The primary driver for Climate Leadership & Community Protection Act (Climate Act) implementation and the NYPA Draft Plan for renewable development is [Public Service Law \(PSL\) Section 66-P](#), Establishment of a renewable energy program. It requires the Public Service Commission (PSC) to establish a program that meets the 2030 Climate Act mandates that a minimum of 70% of the statewide electric generation in 2030 is generated by renewable energy systems and the 2040 requirement that the statewide electrical demand system will be zero emissions. PSL 66-P also includes often overlooked boundary condition provisions. The PSC is empowered by this statute to temporarily suspend or modify these obligations if, after conducting an appropriate hearing, it finds that the PSL 66-P impedes the provision of safe and adequate electric service.

My comments argue that the NYPA Draft Plan must develop its own affordability and reliability boundary conditions to ensure that its plans maintain adequate and reliable electric supply. The Draft Plan guides NYPA's mandate to "plan, design, develop, finance, construct, own, operate, maintain and improve renewable energy generation projects to maintain an adequate and reliable supply of electric power and energy and



support New York State's renewable energy goals established in the Climate Act". Technical staff at NYPA understand the impacts of renewable energy on the electric system whereas the legislators that promulgated the law requiring NYPA to advance renewable energy did not. Establishing constraints based on a comprehensive understanding of the electric system is a commonsense safeguard.

If there are no constraints, then it is very likely that there will be unacceptable consequences. Moreover, two things have changed since NY politicians expanded NYPA's renewable energy responsibilities that should be reflected in the 2025 Draft Plan. It has become clear that the costs to implement the Climate Act are significantly more than expected. There was a blackout on the Iberian Peninsula that was associated with solar generation. The Draft Plan should address both.

I [submitted comments](#) on last year's NYPA Renewables Strategic Plan that argued that the Draft Plan should be paused until completion of a comprehensive feasibility analysis. These comments suggest that if the boundary condition criteria are exceeded that implementation should be paused, and a feasibility analysis completed before proceeding.

Affordability

My overarching concern with Climate Act implementation is affordability. Since the last update to the NYPA strategic renewable energy plan [Governor Hochul has acknowledged](#) this problem, As part of local re-election outreach this summer Governor Hochul turned up at a western New York restaurant to discuss affordability issues. **Buffalo TV Station WRGZ 2 On You Side** asked (video) about the effect of the Climate Act on consumer bills. She [suggested that a "slow down" on the Climate Act was needed and costs are an issue:](#)

We asked: "On affordability, you mentioned utility bills. Heard you say it, governor. Isn't it true that ratepayers are paying for that because of the climate change law. We do know the the Public Service Commission (in February 2023) actually allowed for increased rates to be able to pay for some of that, connecting various ..."

The Governor responded, "This law goes back a number of years."



At the end of her long response on utility rates and energy strategy, there was this summation from Hochul: "You're absolutely right. Utility costs are a huge burden on families, and I'll do whatever I can to alleviate that."

This is relevant for the Draft Plan because the Governor recognizes the goal of “affordable, reliable, emission-free electricity”. The affordable and reliable electricity goals are meaningless unless those terms are defined. The Draft Plan must acknowledge the PSL 66-P boundary conditions and recognize that the definitions are imprecise and [need to be to be refined](#) to properly protect New Yorkers. The fact that there is insufficient guidance should not mean that NYPA does not have the responsibility to address this problem. NYPA has the technical expertise to define its own criteria for affordable, reliable electricity that should be incorporated into the Draft Plan.

Reliability

On April 28, 2025, a problem at a photovoltaic plant in Spain triggered a blackout over the Iberian Peninsula. The Draft Plan must address the ramifications of this blackout.

Two recent articles at the Watt-Logic blog described the blackout that affected Spain, Portugal, and France. I include these descriptions because NYPA staff understand the problems but most New Yorkers do not. The [first article](#) looked at the physics of power grids and the general behavior of both synchronous generation (gas, hydro and nuclear) and inverter-based generation (wind, solar and batteries). Watt-Logic gives an overview explanation of the “importance of voltage control and reactive power” that were the root cause of the Spanish blackout. In short, the existing system depends upon synchronous generators that convert mechanical energy (spinning turbines) into electrical energy, producing alternating current that matches the frequency of the electric grid. These generators inherently provide important electric grid functions that are difficult to replicate with inverter-based resources like wind, solar, and energy storage. The overarching problem is that not only do inverter-based resources not perform many of these necessary functions, but they can also de-stabilize the grid in certain, poorly understood circumstances.

The [second post](#) addressed what we know about the Iberian blackout. Watt-Logic explains that the blackout “demonstrated the importance of voltage control and reactive



power, and how a weak grid, with poor controls, was brought down by a single faulty solar inverter.” The basis of the blog post was a “concise but informative [report](#) produced by Red Eléctrica de España ("REE"), the Spanish Transmission System Operator ("TSO"), which is more accessible than the much longer government report (available only in Spanish – rough English translation [here](#)).”

Watt-Logic lists the key messages from the REE report:

- The blackout was triggered by a PV inverter–induced voltage oscillation
- Inappropriate disconnections of wind and solar generation, and widespread failure of reactive power support, escalated the disturbance
- REE relied on static controls and failed to deploy dynamic response assets
- Grid code non-compliance was widespread among renewables, conventional generators, and even REE itself (via non-compliant transformers)
- The collapse exposes systemic risks in low-inertia grids with high levels of inverter-based resources ("IBRs") and inadequate voltage control
- It is notable that, despite confident denials from some renewables advocates in the immediate aftermath, it was in fact a malfunctioning solar installation that triggered the voltage oscillation initiating the collapse. Wind and solar generators failed to meet fault ride-through obligations, and both inverter-based and conventional generators failed to provide the required reactive power support. Crucially, conventional generators did not trip prematurely – they remained online until system conditions breached their design tolerances.

The second reason that the Spanish blackout should be considered in the Draft Plan is because of the cost implications of providing ancillary services necessary for reliability. Many still believe the claim that solar is the cheapest form of energy. A recent [Doomberg blog explains](#) that after the blackout in Spain earlier this year “the true cost of solar can no longer be hidden from the public.”

The Doomberg post describes the blackout and the attempts by Spanish authorities to deflect blame away from the possibility that the problem was due to the solar facilities.



Their post goes on: “As the results of the investigation became undeniable, responsibility was pinned not on solar but on the grid operators who had failed to make the necessary investments to handle the rapid influx of green electricity.” They noted that:

Last week, an expansive article in *Bloomberg Green*—confessionally titled “[The Fix For Solar Blackouts Is Already Here](#)”—captured this sentiment. It lamented that the penetration of solar and wind has outpaced the buildout of stabilization technologies such as synchronous condensers and grid-forming inverters. In other words, the renewables worked as designed, but the infrastructure to integrate them safely at such high percentages of supply lagged far behind:

“The result is huge spending on new wind and solar capacity, but not enough on grids. The 27 members of the European Union and the UK invest on average \$0.7 in grids for every dollar spent on renewables, according to BloombergNEF. Spain ranks the lowest, with only \$0.3 spent for every dollar.”

Blackouts are causing political backlashes against renewables that politicians cannot afford right now. ‘Here’s the problem: Investments in the right infrastructure are not keeping up,’ said António Guterres, head of the United Nations, in a July speech. ‘That ratio should be one to one.’”

The NYPA Draft Plan does not mention this blackout and its implications. The authors of the legislation requiring that NYPA support renewables have a very superficial knowledge of the electric system. They subscribe to the presumption in simplistic academic energy studies which guided the Climate Act that generation and load are sufficient to predict success—that if there is enough generation to equal the load, no matter the quality of the source or where it is located, the system will work. Deflecting blame, renewable proponents now say that insufficient “grid investments” caused the Iberian blackout, not renewables. However, if not for an over-dependence on intermittent inverter-based resources, the unique grid investments to support them would be unnecessary. If renewables are expanded beyond the ability of the grid to compensate for the problems they create, then blackouts are inevitable.



NYPA has the technical expertise to define criteria for reliability standards necessary to address the observed problems that lead to the Spanish blackout. Appropriate criteria must be developed and used to guide renewable energy deployment.

Other Comments

In addition to its responsibility to provide boundary conditions to ensure affordable and reliable electricity, the expert staff at NYPA need to confront the emotion-driven rhetoric of uninformed clean energy advocates when their claims do not meet technical standards necessary for policy decisions. Such comments often begin with the demand that NYPA must double its efforts and build the 15GW that New York needs “to comply with the CLCPA, lower electricity bills, create 25,000 green union jobs, and end our fossil fuel dependence.”

The comments demanding that NYPA “must build 15 GW of public renewable energy by 2030” ignore reality. Numerous implementation issues have delayed deployments to the point where the [Clean Energy Standard Biennial Review](#) admits that the 70% renewable energy by 2030 target will not be achieved. There should be no expectation that NYPA can accelerate its deployment substantially for the same reasons.

The myth that wind and solar will lower electricity bills is evaporating as described in the section addressing the Spanish blackout. It is not enough to just build renewable energy. Investments in grid infrastructure cited by the head of the United Nations must be made. These include transmission, storage, dispatchable backup generation, and grid-stabilizing improvements to compensate for inverter-based technology. However, all of these add to total cost of the system.

Commenters claimed without any evidence that building 15 GW of renewables would “create 25,000 green union jobs”. Too often New York’s energy policies have ignored experiences in other jurisdictions that have already tried to pursue a net-zero transition. David Turver has described the [cost of green energy jobs](#) in the United Kingdom. One of the points he makes is that number of green jobs means that the energy sector is becoming less productive. Most of these jobs are utterly dependent upon subsidies which adds inefficiency. He concludes:

We can see that each offshore wind job cost £264K in subsidy, each onshore wind job cost over £309K and solar nearly £100K. The average across all three sectors is over £192K per job.



At the current exchange rate, the average across all three sectors is over \$259,000 per job. This leads to the question that the Draft Plan must address. Who is going to pay for those subsidies?

The claim that deploying more renewables will “end our fossil fuel dependence” ignores society’s broader dependency on fossil fuels. Ronald Stien has [made the point](#) that “the world’s 8 billion are dependent on more than 6,000 products made from the oil derivatives manufactured from crude oil”. Furthermore, until [dispatchable, emissions-free resources](#) are deployed New York’s electric grid has to rely on dispatchable fossil fuel generators. Deploying excess renewable energy affects the economic viability of the backup fossil fuel generators and will likely lead to subsidies to maintain that necessary support.

Conclusion

The current Climate Leadership & Community Protection Act (Climate Act) PSL 66-P implementation plan relies on wind and solar generation because the authors of Climate Act asserted that the plan would work with existing technologies and would be cost effective. However, no jurisdiction anywhere has successfully developed an electric system that relies on those resources to the extent proposed by the Climate Act. In comments submitted last year, I argued that it is premature to advance renewable energy as proposed unless and until a demonstration project has been completed that proves that the proposed wind, solar, and energy storage approach can produce affordable, reliable, emission-free electricity. Events that have occurred since then reinforce this. The Draft Plan should be paused until completion of a comprehensive feasibility analysis outlining how issues raised in these comments and elsewhere can be addressed without affecting the mandate for reliable and affordable electricity. As an alternative, the Draft Plan must define safety valve criteria for affordability and reliability metrics. If the safety valve criteria are exceeded then implementation should be paused until alternatives that will not adversely affect affordability and reliability are identified and proven in a demonstration project. This approach is the only way to ensure that actions in the Draft Plan do not cause unaffordable and unreliable energy.

I submitted this comment because I believe that the unresolved issues associated with inverter-based resource deployment pose significant risks to reliability and affordability.



For too long the electric energy system experts in New York have danced around the consequences of the flawed analyses that form the basis of the Climate Act mandates and schedule. The enabling legislation that directs NYPA to double down on wind and solar development without addressing the unresolved issues continues that ill-fated approach. Safety valve conditions that trigger feasibility analyses if exceeded are necessary before proceeding. The opinions expressed in this document do not reflect the position of any of my previous employers or any other company I have been associated with, these comments are mine alone.

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Caiazza Comments on Draft 2024 NYPA Renewables Strategic Plan

The 2023-24 Enacted State Budget authorized and directed the Power Authority of the State of New York (NYPA) to engage in the largest expansion of the Authority's responsibilities in decades to advance renewable energy and support other state priorities. The [Draft NYPA Renewables Strategic Plan](#) (Draft Plan) outlines an approach for developing new renewable energy generation projects to supply New Yorkers with "affordable, reliable, emission-free electricity".

The current Climate Leadership & Community Protection Act (Climate Act) implementation plan relies on wind and solar generation because the authors of Climate Act asserted that the plan would work with existing technologies and would be cost effective. However, no jurisdiction anywhere has successfully developed an electric system that relies on those resources to the extent proposed by the Climate Act. Consequently, it is premature to advance renewable energy until a demonstration project has been completed that proves that the proposed wind, solar, and energy storage approach can produce affordable, reliable, emission-free electricity. At the very minimum, the Draft Plan should be paused until completion of a comprehensive feasibility analysis outlining how issues raised in these comments and elsewhere can be addressed without affecting the mandate for reliable and affordable electric energy.



The addition of other state priorities to the energy supply mandates of NYPA dilutes the efforts and resources necessary to maintain affordable and reliable electric power. The Draft Plan specifically addresses the decarbonization of small natural gas power plants operated by NYPA. My comments specifically address the this component of the Draft Plan.

Misplaced Political Priorities for Peaking Power Plants

An overarching problem with the Draft Plan is that the basis of the issues that must be addressed are based on advocacy lobbying rather than reality. Environmental justice advocates like the [Peak Coalition](#), have convinced state officials that New York City peaking power plants are “perhaps the most egregious energy-related example of what environmental injustice means today.” The enacting law for the Draft Plan specifically directed NYPA to publish a plan by May 3, 2025, to end generating electricity with fossil fuel at its 11 small natural gas power plant (SNGPP) units located at 7 sites in New York City and on Long Island by the end of 2030 if reliability and environmental requirements are met. I have [documented](#) that the presumption of egregious harm is based on selective choice of metrics, poor understanding of air quality health impacts, and ignorance of air quality trends. In brief, the continued operation of these facilities will have no discernable impact on local neighborhood air quality and shutting them down is solely political virtue-signaling. On the other hand, these facilities serve specific reliability needs that are not easily replaced.

Electric System Resource Planning

Peaking power plants address a specific electric system planning concern. Extreme hot and cold weather increases the use of electricity leading to peak loads. Because the primary building and transportation sector decarbonization strategy is to electrify those sectors, future loads must increase exacerbating the problem and need for peaking power plants. No superior alternative to these units has been identified.

Clean energy advocacy organizations have naïve and dangerous ideas about electric system resource planning and fail to properly consider the challenges associated with peak loads. Somehow advocates presume that the current emphasis on planning for extreme conditions is not necessary because their proposals for load reduction and load shifting programs will minimize peaks. In reality those efforts will reduce loads on average over long periods, but when the system is stressed will do very little to support the system.

Another under-appreciated reliability challenge relates to planning for backup when the sun does not shine, and wind does not blow. Some studies claim the problem is resolved when they show that a system comprised of wind, solar, and short-duration storage (*i.e.*, 4 and 8-hour capacity duration) can economically meet daily demand most of the year. However, if the goal is to always provide electricity, then the seasonal differences in wind and solar supply and consequent storage requirements must be



considered. Furthermore, analyses have shown that there are prolonged droughts of wind and solar availability that must be addressed. This gap between renewable resource availability and load has led to recognition that there is a need for a new supply technology beyond renewables and storage resources that can provide dependable supply during peak periods. The New York Independent System Operator (NYISO) calls this the [Dispatchable Emissions-Free Resource](#) (DEFER).

There is an often-overlooked aspect of wind, solar, and energy storage so-called solutions relative to peaking power plants. They do not provide ancillary support attributes that hydro, nuclear, and fossil fuel resources provide today. This complicates the challenges associated with replacing the small natural gas power plants operated by NYPA.

Dispatchable Emissions Free Resources

In my review of the Draft Plan, I found no reference for the need for DEFER, yet it is critical to address and respond to the feasibility of [DEFER](#) options. The NYISO [2023-2042 System & Resource Outlook](#) (“Outlook”) Overview in [Appendix F - Dispatchable Emission-Free Resources](#) evaluates DEFER options that they believe represent the most likely viable approach but concede that there still are concerns.

“While DEFERs represent a broad range of potential options for future supply resources, two technology pathways being discussed as potential options for commercialization are: 1) utilization of low- or zero-carbon intensity hydrogen (typically generated by electrolysis derived from renewable generation) in new or retrofit combustion turbine or fuel cell applications or 2) advanced small modular nuclear reactors, which are currently seeking approval from the relevant regulatory bodies to design and operate these resources. Currently, both technologies have shown limited commercial viability on the proof of concept. Even assuming that they are commercially viable, there remains significant work in the implementation and logistics that must be overcome to economically justify transitioning the dispatchable fleet to some combination of new technologies in the next 15 years. Long-duration energy storage could potentially serve in the role of the modeled DEFERs in the Outlook. In many respects, long-duration energy storage closely mimics various hydrogen production and conversion pathways. Long-duration energy storage adds to load in many hours, similar to electrolysis production of hydrogen. However, a notable difference is that electrolysis production of hydrogen has a lower round-trip efficiency when injecting energy into the system compared to other long duration energy storage technologies under development”.

This is a particular problem for the decarbonization of small natural gas power plants operated by NYPA. Peaking power plants operate similarly to the proposed DEFER technology. If NYPA cannot point to a proven DEFER technology that provides the grid support requirements equivalent to the fossil-fired plants that can be deployed in the footprint of those sites, then it is



premature to consider retiring the units. There will be pressure to comply with the arbitrary schedule mandated by politicians for replacing the NYPA facilities and I have no doubt that an analysis can be concocted to show that they can be retired. However, any wind, solar, and energy storage solution without a proven DEFR component available will make the grid more fragile and prone to blackouts. In my opinion, preventing the consequences of blackouts is more valuable than the purported benefits of shutting down the peaking power plants.

Planning for Extreme Weather Events

The final challenge for an electric system that relies on weather-dependent renewables is that developing adequate DEFR resources must account for weather variability. The Draft Plan should address challenges associated with weather variability risks associated with planning for the DEFR resources necessary for extended periods of minimal wind and solar resource availability.

The first challenge is calculating the DEFR resources required, which requires analysis of meteorological data to estimate resource availability and expected loads. The evaluation of the meteorological data develops a probabilistic estimate of the resources needed that are analogous to the one in a hundred-year flooding parameter. I believe evaluations to date need to be expanded because they haven't used the longest period of data available, and they have not included adjacent regional transmission operator areas.

The second challenge is the need to acknowledge and address the risks associated with changes to electric resource planning necessary to account for weather variability embodied in the probabilistic resource availability estimates. Today's resource planning process must meet a one-in-ten-year loss of load reliability criteria. This period is acceptable because observations of existing generating resources over many years show that unplanned outages do not happen at the same time. Planners have a good idea of how many facilities can run into problems and go offline at the same time. As a result, reliability criteria based on ten-year periods have provided dependable electric energy and there is little likelihood that outages will be much lower over longer periods. However, future resource planning must address the fact that extreme weather patterns affect wind and solar resources at the same time and for longer outage durations than today. This means that when the planning criteria are exceeded it will be a bigger problem than with today's system. Strengthening the planning criteria will reduce the probability of exceeding the planning criteria but the fact that eventually any weather-dependent standard will be exceeded means that someday the resources will be unable to meet the expected load.

This is a particular problem for peaking power plants in New York City. Replacing generators with proven reliability attributes with new technologies that are reliant on weather-dependent resources significantly decreases resiliency and increases reliability risks. Combined with the fact that the proposed DEFR technologies are all significantly more expensive than fossil fuel alternatives means that a DEFR feasibility analysis would be prudent before committing to retiring the NYPA SNGPP units.



Renewable Energy System Viability

Reliable access to electricity is necessary today and when more sectors of society are electrified blackouts will be even more impactful. The challenges described were not considered by the authors of the Climate Act and not adequately addressed in the Scoping Plan. The Draft Plan doubles down on the presumption by the Climate Act authors that a wind and solar reliant electric grid can work even though such a system has never operated without fossil backup in any jurisdiction. The Draft Plan must address the unresolved critical challenges of renewable energy availability.

The authors of the Climate Act and the enabling legislation for this effort believe that the New York electric grid can transition away from fossil fuels and instead rely on wind, sun, and energy storage with no new technologies needed. However, the organizations responsible for New York State electric system reliability agree that DEFR technologies are needed. The New York Independent System Operator (NYISO) [2023-2042 System & Resource Outlook](#), and [Power Trends 2024](#) analyses and the New York Department of Public Service (DPS) [Proceeding 15-E-0302](#) Technical Conference determined that DEFR was needed. Independent analyses by the [Cornell Biology and Environmental Engineering](#), [Richard Ellenbogen](#), and [Nuclear New York](#) also found that it was needed. These analyses are summarized in a [readable description of the DEFR problem](#) by Tim Knauss describing the work done by Cornell's Biology and Environmental Engineering Anderson Lab that found that "Just 15 years from now, the electric grid will need about 40 gigawatts of new generating capacity that can be activated regardless of wind speeds, cloud cover or other weather conditions".

There is another implication regarding the DEFR requirement. It means we cannot rely on renewables unless we have a viable DEFR technology available. In my opinion, the most likely DEFR backup technology is nuclear generation because it is the only candidate resource that is technologically ready and can be expanded as needed. Furthermore, other alternative technologies must overcome what I think are [intractable conflicts](#) with the Second Law of Thermodynamics.

I believe that the NYPA Strategic Plan should be paused until a feasibility analysis proves that the proposed renewables approach including DEFR can work. If the only viable DEFR solution is nuclear, then renewables cannot be implemented without it. But nuclear can replace renewables, eliminating the need for a massive DEFR backup resource. Therefore, it would be prudent to pause renewable development under the NYPA initiative until DEFR feasibility is proven because it may be that nuclear generation may be the only viable way forward. Nuclear power has other advantages that call for it to be the cornerstone of New York's future zero-emissions electric system. Nuclear power has the [smallest overall environmental footprint](#) of all energy sources because it doesn't take up much land and has very low mineral intensity. The physics of nuclear power is far superior to any other energy source because of its extremely high energy return on energy invested, meaning we get far more energy out than we expend building the power plants. Nuclear power does not require massive additions to the



transmission and distribution systems nor does it require deployment of resources for ancillary services support that will be required for renewables buildouts. Nuclear generating life expectancy is far longer than any of the components of wind, solar, and energy storage generating. Finally, the output is reliable and robust because the input energy is stored on-site. Nuclear power opponents claim that deployment would be too slow. [David Turver](#) provides a response to that argument:

“Arguing for wind and solar in place of nuclear power is akin to arguing in favor of chocolate teapots because you cannot wait for a ceramic one. No matter how many chocolate teapots you buy, you can never make tea; just like no matter how many wind turbines and solar panels you install you can never run a modern economy on intermittent electricity”.

Doubling down on renewable generation jeopardizes reliability and affordability. NYPA should do what it has historically done best by supporting electric system technologies with proven track records. It is generally acknowledged that so-called advanced nuclear generation is a better path going forward than trying replicate current nuclear technology. NYPA resources would be better spent making nuclear power a viable zero-emissions resource for New York than supporting renewable developments.

Solar Development Recommendations

I am not going to comment on specifics of the Draft Plan. However, I believe that [solar development in New York](#) has been poorly implemented because there is [no overall plan](#). In my [Scoping Plans comments](#) I called for a moratorium on solar development that described some of the issues. My biggest concern is that the Hochul Administration has not required solar developers to adhere to all the NYS Department of Agriculture and Markets (NYSDAM) guidelines that have been described in [prepared testimony](#) that I believe represent best practices and should be mandatory going forward. In particular, “The Department’s goal is for projects to limit the conversion of agricultural areas within the Project Areas, to no more than 10% of soils classified by the Department’s NYS Agricultural Land Classification mineral soil groups 1-4, generally Prime Farmland soils, which represent the State’s most productive farmland.” I think this is a reasonable guideline and one that should be a mandatory requirement for all projects supported by NYPA.

The Draft Plan should also address a solar development planning deficiency. The Integration Analysis used to quantify the solar resources in the Scoping Plan projects that 2035 capacity factors for solar capacity in all the mitigation scenarios exceed 20%. In my opinion those estimates are overly optimistic. What cannot be denied, however, is that they represent solar installations with tilting-axis solar panels that maximize energy production. The problem is that there is no mandate that solar developers must install tilting-axis panels, and they are not doing it. Consequently, the capacity projections forecast by the Integration Analysis underestimate how many solar panels must be deployed. Solar projects supported by NYPA must use tilting-axis solar panels.



There is another solar deployment issue. The lack of solar resource generation determines the magnitude of the DEFR resources required. In the winter solar generation capacity is limited by day length, low solar angle, and greater cloudiness across New York State. There is one other factor that is difficult to incorporate in capacity projections. When solar panels are covered by snow then output is reduced even more. I think this needs to be addressed at solar projects supported by NYPA. Tilting-axis solar panels are a viable solution because the panels can be oriented vertically when snow is forecast. I point this concern out because my [anecdotal survey](#) of solar panels in New York City found that many rooftop panels were placed flat. The worst-case wind and solar drought will occur when a massive polar vortex settles over the state bringing intense cold and light winds. The start of a polar vortex intrusion often includes a severe snowstorm. While conditions are often clear during a polar vortex, solar output from snow-covered panels is essentially nil. Solar projects supported by NYPA must never support facilities with flat panels.

Conclusion

The Draft Plan doubles down on the presumption by the Climate Act authors that a wind and solar reliant electric grid can work even though such a system has never operated without fossil backup in any jurisdiction. The Draft Plan must confront the fact that political will cannot overcome reality and address the unresolved critical challenges of renewable energy reliability and impacts to affordability before advancing renewable energy as proposed.

If New York wants to decarbonize without compromising resource adequacy, reliability standards, and affordability then the only feasible solution is to rely on advanced nuclear power as the primary provider of firm generation capacity. This should be reflected in the Draft Blueprint. NYPA has historically done best by supporting electric system technologies with proven track records and can continue their record of success by supporting nuclear energy development.

At some point the electric energy experts responsible for the system must tell the state officials that the arbitrary schedule and unproven technologies of a wind, solar, and energy storage zero-emissions approach are too big a risk to reliability to continue down that path. The Draft Plan should make that case.

I submitted this comment because I believe that the unresolved issues associated with DEFR deployment pose significant risks to reliability and affordability. For too long the electric energy system experts in New York have danced around the consequences of the flawed analyses that form the basis of the Climate Act mandates and schedule. The enabling legislation that directs NYPA to double down on wind and solar development with resolving the unresolved issues continues that ill-fated approach. A feasibility analysis is necessary before proceeding.



The opinions expressed in this document do not reflect the position of any of my previous employers or any other company I have been associated with, these comments are mine alone.

Roger Caiazza

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Liverpool, NY

Gary Abraham

2024 Comments

My name is Gary Abraham. I am an environmental attorney based in western New York, and I practice all over upstate New York. I have represented community groups and municipalities in the siting of large-scale renewables before Article 10, during Article 10 and under the ORES program.

I am dismayed that the climate activists who have spoken here have ceased to be environmentalists. They seem to think you can unplug nuclear power plants and simply plug in renewables to replace them. This reflects a failure to understand how electricity works. In reality, gas-fired backup power is needed for all wind and solar installations. The more renewables, the more gas is needed. Renewables also require substantially more minerals and metals, and the emissions of extracting, processing and transporting them than other types of power. Another big concern is the large land needs of renewables compared to other types of power, and what renewables do to the land.

A window on this problem is provided by the Alle-Catt Wind Energy project in western New York, one of the projects NYPA would adopt according to the draft strategic plan. NYPA has not reached out to the host communities. The project was approved by the state Siting Board in 2020 but construction has begun only on the non-electrical portions of the project. The state Department of Health testified during a hearing that project noise would be a significant public health risk. The state Siting Board found that the project would kill between 480 and 515 birds annually including six threatened or endangered birds. Over the 30-year life of the project, 41 bald eagles will be killed; between 26,000 and 39,500 bats will be killed, including two species listed as threatened or endangered; of 5,900 forested acres needed for the project, 1,550 acres would be cleared, and another 1,686 acres of remaining unbroken forest would be fragmented with access roads and electrical corridor paths. The project's power would not reach downstate because there are no uncongested transmission route to New York City.



NYPA's renewable development program is governed by Public Authorities Law, Section 1005. Under PAL § 1005(27-a)(b), in developing renewable energy projects, NYPA must “minimize harm to wildlife, ecosystems, public health and public safety”.

Under PAL § 1005(27-a)(h), NYPA is not authorized to sell power or renewable energy credits generated by renewable energy projects unless those projects are “developed after [the] effective date” of NYPA's strategic plan. Alle-Catt is being developed now, so it does not qualify for NYPA financing.

NYPA cannot reasonably expect to advance decarbonization goals by sponsoring projects like Alle-Catt. PAL § 1001 authorizes NYPA to undertake demonstration projects. NYPA should demonstrate how a build-out of renewables would affect emissions and the environment, and whether a build-out would be cost effective. No one has ever done that. Finally, given the environmental destructiveness of such projects, my friends in the climate activist movement need to become environmentalists again.

Keith Schue

New York Energy & Climate Advocates - spoken testimony by Keith Schue on August 20, 2025

I am Keith Schue with New York Energy & Climate Advocates, an organization that understands the need for climate solutions that work in the real world. I have a Masters in electrical engineering. I am also an environmentalist. In fact, I was employed several years with The Nature Conservancy in Florida, where my work focused on the relationship between human infrastructure and ecosystems. When I moved to New York, I fought fracking.

In my opinion, there is an important role for public power. It is to build energy assets that are more difficult for the private sector, maybe due to upfront cost or a longer return on investment, but which are essential to energy security and a functional grid. NYPA's involvement in developing and operating New York's long-lasting hydropower and nuclear facilities are good examples of this. So is the Governor's recent announcement directing NYPA to build new nuclear. So is NYPA's building of transmission.

On the other hand, I am not particularly thrilled about NYPA spending public resources to deploy underperforming, fragile, intermittent forms of energy that do not last, that are made in China, and that weaken our grid.

It is not credible to demand 15GW of solar/wind when the infrastructure will not be there to support it—and more importantly without a system-level strategy to actually get us to zero emissions. Intermittent generation, even with a gargantuan amount of storage, cannot solve this problem. Without prudent planning today for advanced nuclear, we will find ourselves in a



situation where fossil fuels get locked in as an inextricable “partner” of solar and wind. This is already happening in California and Germany.

I do understand you have directives. But I would urge NYPA not to deplete all of its resources and financial capital, when those resources will be absolutely essential to ensure that our grid continues to work and as we hopefully pursue a decarbonization strategy that understands the importance of high-capacity-factor firm generation.

I want to say something about the proposed projects. I agree with some who spoke yesterday about the need to bring renewable generation closer to the load. It won't get New York City off fossil fuels, but it makes a little more sense than what you are doing now.

I am also concerned about ecological harm. For example, one of the proposed projects is a giant 449 MW wind installation straddling the northern edge of the Adirondacks just south of the St Lawrence River. That could clobber an important north-south flyway for migratory birds between the US and Canada.

A big problem with the proposed RAPID Act regulations is that they do not consider ecological connectivity and large landscape-level ecosystems that extend beyond the boundary of individual projects. Frankly, I am saddened that many so-called “environmental” groups have stopped caring about such things. But now as a public partner on renewable projects, NYPA must. For reference, the 340 MW Alle-Catt wind project no longer involves NYPA, but is projected to kill 87 bald eagles over its lifetime. Meanwhile today there are only about 400 breeding pairs of bald eagles in the state. So if New York erects thousands of wind turbines upstate to make 10,000 MW of power like some are demanding, it ought to be clear that extirpation of the species in our state is a real danger. Cumulative impacts matter.

I will put more comments in writing. Thank you.

New York Energy & Climate Advocates oral comments on NYPA Renewable Plan Keith Schue – November 21, 2024

Keith Schue, with New York Energy & Climate Advocates. I have a Master's in electrical engineering and worked many years in design and development. I am also an environmentalist and was employed with The Nature Conservancy in Florida, where my focus was on the relationship between human infrastructure and ecosystems. When I moved to NY, I became very involved in efforts to fight hydraulic fracking. But let's be honest. Banning fracking in NY was EASY when there is plenty of gas coming from PA. It's a lot harder to actually stop burning fossil fuels. It takes MORE than political will. It involves HARD science and engineering. It involves setting ideology and slogans aside, and figuring out what actually WORKS. Sadly, that is also where the mainstream environmental movement has failed. You are hearing people demand 15GW of “renewables” without knowing what that means, without understanding the



difference between power and energy, or capacity factor, or energy density, or the fundamental operational differences between intermittent and dispatchable generation. Demanding an arbitrary “renewable” target without attention to whether it actually displaces fossil fuels or even reduces GHG emissions. And without regard for how it promotes wasteful sprawl or hurts the environment—wildlife, habitat, rural lands, farmland, forests, nature. If any of those things are still important to environmental groups, then they will support a diversity of energy sources that includes firm, reliable, NUCLEAR POWER—which has the lowest lifecycle emissions, the smallest physical footprint, and the smallest material and MINING footprint of any energy source. I think this strategic plan is flawed, but NOT because it doesn’t build X amount of solar and wind. It is flawed because it takes the eye off the ball—which is greenhouse gas reduction AND providing the abundant, reliable energy for a healthy economy and workforce. The BPR gave NYPA authority to build renewables. Fine. But you also have authority to assist in developing other sources like nuclear—AS YOU HAVE DONE SO SUCCESSFULLY BEFORE. The reason upstate NY has reliable, affordable electricity and the reason our upstate grid is 90% carbon-free TODAY— is BECAUSE of NYPA’s EXCELLENT LEADERSHIP and EXPERTISE in helping to bring us Niagara, St Lawrence FDR, 9-Mile Point, Ginna, and Fitzpatrick. So, I respectfully urge you to use your expanded authority to look at ALL carbon-free sources, examine the unique attributes of each, and then work to develop the BEST MIX that can actually get us over the finish line and fully decarbonize our grid. Yes, we need more renewables than today, but we are also going to need MORE NUCLEAR POWER—so let’s plan for that. New York is fortunate to have a Governor who is leveling with the public on this, as we saw in Syracuse. And frankly, it’s sad that misguided activists are harassing her for being honest, and now harassing NYPA for not performing magic. Syracuse was a game changer and your plan should reflect that. Follow the Governor’s lead, refocus on the goal of decarbonization, and then do what is best for all New Yorkers rather than just those who yell the loudest.

Dennis Fitzgerald

November 2024

A Realistic view Comparing Existing Nuclear with Wind and Solar Energy

When the NYPA Renewables Strategic Plan refers to adding 3.5 GW of renewable capacity it must make clear the details of that statement. Because of the low capacity factor associated with wind and solar of about 25%, when compared to 3.5 GW of nuclear capacity at about 95%, to produce an equivalent amount of energy (gigawatt hours) the wind and solar 3.5 GW capacity would have to be closer to 14 GW. Energy storage would have to be able to store the 75% of excess renewable energy to be made available when there is no wind or solar. All of which will



require an increasing amount of land. The draft also fails to address the relatively short life span of 20-25 years for wind and solar as compared to 80 years for nuclear reactors. With the large number of wind turbines, solar panels and energy storage required to meet the significant energy demands, now and even more in the future, there will be a massive and ongoing effort to continually replace and dispose of wind and solar equipment. The plan needs to present an honest and detailed description of the final product including justifiable requirements, energy production estimates, costs, land usage and equipment replacement planning.

If New York is serious about achieving carbon-free electricity as electricity demand doubles, it must invest in reliable and resilient nuclear power that is made in America, instead of focusing on wasteful, unreliable, fragile, costly and ecologically destructive wind and solar. Energy decision makers must start considering the viability and costs associated with various energy options rather than legislatively dictating solutions without first understanding their short term and long term consequences. The information below is a comparison of existing wind and solar electrical generation to nuclear using the recently completed Vogtle nuclear plant in Georgia with the third largest wind farm in the world, the Alta Wind Energy Center in California, the Shepherds Flat Wind Farm in Oregon and the Solar Star Projects, Solar Star 1 and 2 in California. The data used is available from multiple online sites and links have been included. To get an energy to energy comparison, the renewable energy farm data is scaled using their actual capacity factors to equal the energy produced by the Vogtle nuclear plant.

The Vogtle nuclear plant has a capacity of 4,436 MW with a capacity factor of 91.25% which produces a net average of 4,139 MW. The construction cost was \$34 billion with land usage of 3,100 acres. Existing nuclear technology has provided safe and effective energy for over 60 years and now Vogtle is the first nuclear reactor to be built in the United States in 40 years using new technology, with cost expected to drop for future construction. (https://en.wikipedia.org/wiki/Vogtle_Electric_Generating_Plant)

The Alta wind farm contains 600 turbines, has a capacity of 1,550 MW with a capacity factor of 23.5% which produces a net average of 364 MW. The construction cost was \$2.88 billion with land usage of 32,123 acres. (https://en.wikipedia.org/wiki/Alta_Wind_Energy_Center)

To compare these two electrical generation options, we can equalize the energy outputs by scaling up the Alta wind farm net average output to equal that of the Vogtle nuclear plant. This would require an increase in the number of turbines from 600 to 6,818, with a cost increase from \$2.88 billion to \$32.67 billion. Constructing the additional turbines using the same turbine/land density, the land used would soar to 365,025 acres. Because of the irregular and somewhat unpredictable nature of wind, there is a requirement for energy storage, batteries, cost not included in this example, a lot of them to spread the energy over time to equal the desired constant 4,436 MW produced by the Vogtle example which delivers consistent and predictable power without the need of energy storage. Whatever storage technology is used, it will be limited by the amount of time until the stored energy runs out and needs to be recharged, which will make the wind based system unreliable. We can hope that the wind doesn't stop blowing for very long, but most people would not consider hope to be a reliable strategy.



Next, lifecycles have to be considered. The Vogtle plant lifespan is 80 years, while a wind turbine lifespan is only 20 years. The original 6,818 turbines will have to be replaced 3 times over the 80 year lifespan of the single Vogle nuclear plant. Assuming 4 times the original \$32.67 billion cost of the wind farm, the 80 year cost now rises to \$131 billion. Almost 4 times the cost of the Vogtle nuclear plant, which was \$34 billion. This example demonstrates the incredible amount of wind infrastructure, cost and wasted land resources it would take for wind turbines to equal just one nuclear plant. The task of replacing turbines would become never ending. This one example would require replacement of the 6,818 turbines over 20 years, or 340 replacements per year, forever. Imagine the replacement schedule and the disposal of materials going to landfills required to power the state or the entire nation with wind.

Another large wind farm that can be considered is the Shepherds Flat Wind Farm in Oregon which has capacity of 845 MW with a capacity factor of 22.7% which produces a net average of 192 MW produced by 338 turbines. The construction cost was \$1.9 billion, with land usage of 11,769 acres. Scaling up this wind farm by a factor of 21.58 to equal the energy output of Vogtle would result in 7,294 turbines with land usage of 253,975 acres. The construction cost would increase to \$41 billion with an 80 year cost of \$164 billion. These figures closely align with the Alta example. (https://en.wikipedia.org/wiki/Shepherds_Flat_Wind_Farm)

Looking at solar, the Solar Star Projects, Solar Star 1 and 2 in California with a capacity of 747 MW with a capacity factor of 32.8% which produces a net average of 245 MW. Solar Star cost \$2.5 billion and uses 32,000 acres. Scaling up this solar farm by a factor of 16.9 to equal the energy output of Vogtle would result in the cost rising to \$42.2 billion and land usage of 540,582 acres. The lifespan of the project is 25 years with the output dropping to 87% of the original as the panels age. The 80 year replacement cost would be \$135 billion.

(https://en.wikipedia.org/wiki/Solar_Star),

(<https://us.sunpower.com/sites/default/files/media-library/case-studies/cs-solar-star-projects-fact-sheet.pdf>)

Considering the resource burden associated with unreliable wind and solar, along with an estimated 80% of wind and solar components being purchased from America's top adversary, China and its human rights issues, when reliable US made nuclear alternatives are available, the question has to be: Why would we even be considering wind and solar at all?

Recently in the news Google and Microsoft are preparing to secure their data center power requirements by either building their own nuclear plants or contracting with nuclear plant owners. Data centers are made up of extensive amounts of data processing and data storage equipment that require high levels of uninterrupted electrical energy and cannot be subjected to power outages. These companies know that they cannot risk their businesses on the government's expectations that renewable energy will actually work. They see the future power grid uncertainties resulting from government mandates rather than sound engineering processes and are taking steps now to safeguard their interests. The government should be following their lead and start focusing on nuclear power development.



The following table contains the data available on each of the above mentioned electrical generation facilities. The table also contains the extrapolations to project the upsizing of the wind and solar facilities to match the energy generation of the Vogtle nuclear facility over an 80 year timeframe.

Comparison of Vogtle nuclear plant with Alta wind, Shepherds Flat wind and Solar Star solar							
Energy production source	Nameplate MW	Capacity factor	Net Average MW	Units	cost in \$Billions	Life years	land acres
Vogtle Nuclear Plant GA.	4,536	91.25%	4,139.10	4	34.0	80	3,100
Alta Wind farm CA.	1,550	23.50%	364.25	600	2.9	20	32,123
Factor to increase Alta to Vogtle's energy output			11.36				
Equalized Alta Wind farm numbers	17,613	23.50%	4,139.10	6,818	32.7		365,025
Factor to extend life to 80 years (x4)					130.7	80	
Shepherds Flat Wind Farm OR.	845	22.70%	191.82	338	1.9	20	11,769
Factor to increase to Vogtle's energy output			21.58				253,959
Equalized Wind farm numbers	18,234	22.70%	4,139.10	7,294	41.0		
Factor to extend life to 80 years (x4)					164.0	80	
Solar Star CA.	747	32.80%	245.02	1,700,000	2.5	25	32,000
Factor to increase to Vogtle's energy output			16.89				540,582
Equalized Solar farm numbers	12,619	32.80%	4,139.10	28,718,410	42.2		
Factor to extend life to 80 years (x3.2)					135.1	80	

There is a massive future cost to wind and solar electrical facilities that must be addressed. Because of the relatively short life expectancy, equipment will have to be replaced several times over the 80 year time span that we have been discussing. Using the above data and the life expectancy for nuclear, wind and solar facilities, the following replacement rates can be calculated. Over the 80 year period, to get the same amount of energy from wind or solar generation as would be generated by just one 4.5 GW nuclear facility, we will have to replace:

- 27 thousand wind turbines, including the 81 thousand blades
- or
- 92 million solar panels
- or
- After 80 years, just 1 nuclear facility which would be replaced with 80 years of future technical advancements

To break this down to yearly/daily replacement:

- 337 turbines per year, almost 1 per day
- 1,150,000 solar panels per year, about 3,150 per day

Once again, this would be just one of the consequences of choosing wind or solar over just one 4.5 GW nuclear power plant. These numbers do not include the massive amount of required energy storage or its periodic replacement.



Conclusion

Based on these wind and solar examples, to match the electrical energy produced by nuclear powered generators:

- Solar and wind will take about 100 times the land usage than nuclear
- The long-term construction cost of wind and solar energy is about 4 times that of nuclear
- Current wind and solar construction along with future replacement due to attrition perpetuates an increasing dependency on China
- These cost comparisons should become even more favorable toward nuclear with future construction becoming more efficient
- Additional financing and land usage will be required to build energy storage facilities to support wind and solar intermittent energy production
- The 20-25 year lifespan of wind and solar will create massive recycling and landfill challenges
- Nuclear is reliable
- Wind and solar will always be unreliable, at the mercy of the weather

Based on this comparison of a nuclear power plant with the required wind turbines or solar panels using actual power, capacity, land usage and cost data, it should be apparent that wind and solar do not offer a realistic path to achieving a reliable, cost effective, sufficient and maintainable clean energy goal. If New York is serious about achieving carbon-free electricity as electricity demand doubles, it needs to abandon its unrealistic and short sighted plan that is gambling taxpayer dollars that wind and solar will be able to meet present and future demands. Wind and solar have been attempted and compared to nuclear, they have proven to be a mistake. New York needs to stop investing in wasteful, expensive, unreliable, fragile, short-sighted and ecologically destructive wind and solar and start investing in reliable and resilient nuclear power that is made in America.

Stephanie Milkis

September 4, 2025

I lived in New York State for the first 45 years of my life. I lived within the Alle-Catt Wind Energy project area and have done extensive and intensive research of the negative impacts of industrial wind turbines. My family moved 3 years ago, in part, due to New York State's



unrealistic, unreliable, illogical, expensive and outdated energy policies. I moved to an area of the country that understands the realities of sustainable and affordable power. It is my understanding that many residents and businesses have also taken note of these flawed energy policies and have left or are planning to leave.

I would like to bring your attention to the first lines of the "Updated Strategic Plan." (See below.) It includes the use of words such as "affordable," "reliable," "clean," and "innovative." Energy provided by industrial wind turbines and solar panels is, in reality, expensive, unreliable, destructive, non-renewable and outdated.

"The Power Authority of the State of New York ("NYPA" or the "Power Authority") is pleased to publish for public comment this draft of the first update to its inaugural Strategic Plan ("Updated Strategic Plan") for developing new renewable energy generation projects to supply New Yorkers with affordable, reliable, and emissions-free electricity.

The 2023-24 Enacted State Budget authorized and directed the Power Authority to engage in the largest expansion of our responsibilities in decades to advance renewable energy and support other State priorities. This authority builds on the day-to-day work of NYPA staff to supply the State with reliable electricity, expand New York's transmission system, and provide clean, affordable power and innovative energy services to our customers. This authority will enable NYPA to accelerate the development of renewable energy."

1. UNRELIABLE - New York State Independent System Operator (NYISO) has made repeated statements regarding the intermittency of wind and solar power and concern for unreliable electricity. One specific example is a statement submitted by James H. Sweeny, Senior Attorney New York Independent System Operator to Case 15-E-0202 on August 16, 2023. At pages 5-6, he submits, "In addition to producing the minute-to-minute energy that consumers rely on, existing fossil fueled generators also support overall electric system stability and minimize operational risk by providing black start service, voltage support service, inertia and fault ride through.Without these attributes, the risk that the electric system cannot serve consumer demands or suffer operational issues increases. Blackouts, or electric service interruptions, of the bulk electric system would risk public health, welfare and safety. Reliable operations of the electric system depends on fossil fuel-fired generation today, and will have to continue to do so until the reliability services provided by those resource are replaced by clean generation that possesses the necessary operating characteristics and other solutions..."



Later on page 6, Mr. Sweeny goes on to note that New York's electric system margins have already decreased to unprecedentedly low levels and that New York's policies will drive up the need for more electricity and that unreliability is only going to increase.

Truth and reality will prevail.

2. OUTDATED - It is also extremely important to note here that James Sweeny of NYSO commented multiple times in this document that the technology needed to provide reliable power to the grid from wind and solar does not exist at this time. On page 7, Mr. Sweeny states, "A fleet of resources with the necessary attributes, similar to all of the services provided by the fossil fueled generation fleet, is not commercially available at this time."

Wind power is a 9th century technology believed to be first started in Persia and then used widely into the early 20th century before electricity was available. Over the course of 1,100 years, humans were not able to harness wind power into a reliable source. As a result, the entire world converted to sources of abundant, reliable, on demand power such as coal, nuclear, natural gas, hydro, etc. I urge you to heavily consider the realities of wind power that have already been tried and proven for over a millennium.

If New York State insists that there is a true life threatening crisis, the State should also mandate sails for all ships and recreational boats to help save the planet from the "fossil fuel death spiral," as one public commenter of this strategic plan has exclaimed. Why hasn't new sail technology been re-invented and re-introduced along with the wind turbine technology? Historians conclude that sails have been around since 3,500BC in Egypt, yet, no form of abundant, reliable, on demand sail technology has been introduced.

Truth and reality will prevail.

3. EXPENSIVE - Former Governor Andrew Cuomo built \$33 billion dollars into the New York State Budget for a course of 5 years which falls on the taxpayers' shoulders. Governor Hochul continues to add billions to those expenses. The Alle-Catt Wind Energy project is going to cost \$1.5 billion to build alone. Just 1 wind project in New York State is costing \$1.5 billion. Where does that money come from? These developers do not build these projects without profit for themselves. Invenergy, who is building the Alle-Catt Wind project is estimated to have a net worth of \$10 billion while NYS hands out tax credits and tax breaks while NYS residents are strapped under the highest taxes in the country. Businesses and residents can not continue to carry the burden of these astronomical expenses and will continue to flee the State. Please note that New York has one of the highest exodus rates in the country.

New York State's current budget is \$256 billion. To give you an idea of how unsustainable that is for New York residents, there are 37 states in the nation that operate on a budget of \$40 billion or less. New York residents and businesses will continue to move to states with more affordable taxes and electricity rates.



Truth and reality will prevail.

4. ENVIRONMENTALLY DESTRUCTIVE - The realities of the environmental destruction of industrial wind turbines and solar panels reach far beyond what the average person is willing or able to acknowledge. The impact to the eco-system will be devastating.

a. Tree removal - The Alle-Catt Wind project will remove over 1,600 acres of forest alone. Multiply that by the number of projects NYS plans to build and the the destruction of carbon absorbing trees is exponential. Each mature tree removed an estimated 48 pounds of carbon per year. There is an estimated 400 mature trees within a 1 acre area. I encourage you to do the research and the math in conjunction with the NYS Department of Environmental Conservation to calculate the number of pounds of carbon that will be left in limbo once tens of thousands, if not hundreds of thousands of acres of trees are removed from New York State. I can tell you that just 33 wind projects the size of Alle-Catt Wind Energy will leave 1 billion pounds of carbon hanging in the atmosphere after the carbon absorbing trees are destroyed.

b. NYSDEC has estimated that 26,000-39,000 bats are killed by wind projects each year. They predict that the number will increase after 2030 as more projects are built. Bats are incredibly important for the suppression of insects populations. 1 bat can eat up to 3,000 insects per evening. The impact of insects on New York State's agricultural business will be devastating. This will cause farmers to need more pesticides which is unhealthy for humans, wildlife and waterways.

Trying to correct 1 problem, simply leads to a snowball effect of other problems. I encourage you to explore the chain reaction of the many negative impacts to the eco-system in New York State before proceeding with more wind and solar projects.

c. HDD drilling through streams and the disruption of drainage and impact to the eco-systems of streams.

d. NYS has now allowed wind turbines to be built just 100ft from wetlands. Just a few years ago, it was 500ft.

e. The killing of large raptors which control the pest populations such as mice and other crop eating rodents which will cause a chain reaction of agricultural issues.

f. The Amish of the Alle-Catt project area (Case 17-F-0282) rose concerns of what the impact of vibration will do to the earth worms which are necessary for crop health and growth.

g. There are numerous cases of fires that have impacted thousands of acres of land as a result of wind turbines igniting. Wind turbines hold approximately 600 gallons of oil to operate which can ignite when struck by lightning. New York State needs to consider this when construction 600ft tall turbines in the middle of forests across the State.



h. There is already a case of the destruction of farm land due to a wind turbine fire that spread fiberglass debris across many acres of farmland rendering it useless in Rexville, NY. The current procedure for wind turbine fires is to just wait for it to burn out because there is no way for rural firefighters to put out a blaze on a 500ft. tall towers or more.

i. Many of the materials for wind and solar projects are not able to be recycled. Alle-Catt Wind Energy will have over 12 miles of fiberglass blades alone. Where will they go when a blade needs repair or the project is decommissioned? And then this needs to be exponentially multiplied for each additional project. More land will need to be destroyed to make room for more landfills.

These are just a few of the negative impacts that are raised by residents, acknowledged by the Department of Environmental Conservation and Department of Agriculture and Department of Public Services and ignored by the New York State government in Albany.

Truth and reality will prevail.

5. NON-RENEWABLE - There is a staggering amount of non-renewable metals, materials and rare-earth minerals and mining that go into producing wind and solar projects.

There will be 76 wind turbines that are 600 feet tall with over 12 miles of fiberglass blades. The amount of concrete, metals, oil, cables, access road, etc. will be enormous. Then the vast areas of mining, manufacturing buildings and equipment to then manufacture the wind turbine parts needs to be considered. Then the mining to build the manufacturing buildings and equipment to then build the specialized trucks and cranes to construct the wind turbines and solar panels. Once again, the use of non-renewable resources is exponential and reaches far beyond the scope of a wind turbine or solar panel.

Truth and reality will prevail.

Every New York State agency involved in these energy policies have consistently left the impression that they fail to realize the serious adverse impacts to the health, welfare and safety of the residents or willfully choose to ignore the negative impacts to save their jobs and incomes and have deliberately misinformed many residents into thinking this is a viable solution. Why has no one considered that the continued implementation of wind and solar could cause and acceleration of carbon production and propulsion of climate change? True science based conclusions explore all sides, perspectives and possibilities. New York is not basing wind and solar production on science. They are basing it on fantasy, fear and self-serving profit at the expense of the residents.

Until NYPA and New York take a meaningful approach to ALL possible outcomes of expanding wind and solar, you will need to create a "Strategic Plan" for managing the environmental destruction, blackouts and widespread poverty that will be caused by these unrealistic energy policies.



Thank you for your time and attention to this important matter as it will impact each and every NYS resident. NYPA employees and New York State Legislators will not be immune.

Truth and reality will prevail.

Elizabeth Neadow, Councilwoman, Town of Hartland

August 2025

NYPA is putting the state in jeopardy of becoming a wasteland of brown fields. Beautiful farmland fenced in like a horror movie is a bad plan to become green. These solar fields should not be allowed to destroy NY State's most valuable resource (FARMLAND). There is overwhelming proof that this green energy plan is not green, does not produce large amounts of energy. Please review the plan of destroying towns that do not want it in their town. Home rules should stand. It is a slippery slope if you think you can have access to free American citizen property without their permission. Proof that all of this green energy scam is already raising electric costs with the new approved cost raising over the next 3 years. PLEASE DO NOT DESTROY Western NY TO PROVIDE MORE POWER TO THE CITY. We are green, we want our food local and need to preserve our farmland. Battery storage is another terrible choice to store power. Please look for a reliable source of power and stop imposing on good AMERICANS.

I like to add that the 2026 only electric policy is another infringement on our freedoms.

November 2024

A majority of our townspeople do not wish to have a large industrial solar project in our backyard. I know many towns are interested in housing such facilities; I feel we should have a say of what happens in our neighborhoods. Large scale wind and solar projects can be harmful to small, rural communities. They destroy forest and farmland, devalue our historic & cultural sites, homes, and businesses by removing farmland from effective production.

Please listen to these communities and respect Home Rule.



Many foreign companies are wishing to take part in these solar factories. I believe their main reason to be involved is their interest in the huge government subsidies being handed out by NYS. I call to stop all free handouts to these companies.

Western NY has long been a dumping ground for government waste. We no longer wish to be wasteland.

We are concerned with the use of prime farmland, in our beautiful fertile soils in Western NY. There are so many other wastelands in NYS, such as brownfields, polluted Thruway and Medians, to name a couple. The dangerous battery storage systems are undesirable, in light of all the fires, these are not safe. Our fire departments are small and volunteer. We need to improve technology on such systems before continuing. Solar and wind are a continuous destruction of land causing more brownfields.

Please look into better more reliable sources of power such as improving the Niagara Falls hydro plant.

Stephen Helmin

NYPA Draft Renewables Plan September 12, 2025

What is NYPA trying to hide?

NYPA's public hearings for the draft Renewables Plan continue to fail to reach those communities that would be most adversely affected by the buildout of the tranche of projects that NYPA has outlined, as illustrated below. The people living and working in the mostly rural communities targeted for so many of these projects are voices that NYPA needs to hear.



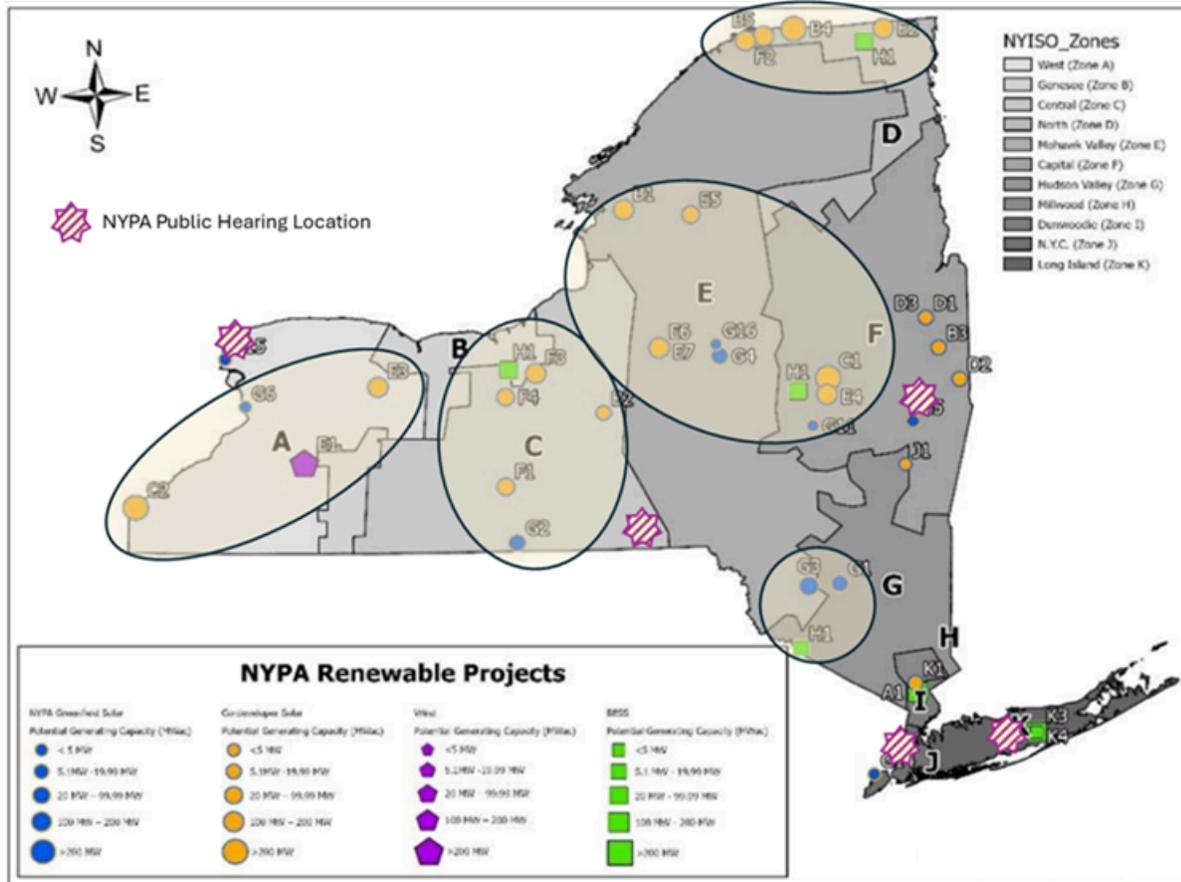


Figure 1: NY Power Authority’s Initial “Tranche” of projects for 2025 from its October 8, 2024 draft Strategic Renewables Plan with areas of significant development highlighted demonstrating the inadequacy of NYPA’s in-person hearings

NYPA’s current map, like the previous incarnation, has been published at such a low resolution that the map key is nearly unreadable. Sadly, it shows the continued issue of a lack of outreach to the impacted communities. The public hearing process worsened, as NYPA opted solely for virtual hearings. This excludes those citizens who shun technology for personal or religious reasons, the elderly, the rural poor who often cannot afford or cannot access quality broadband or large data cell plans and rural residents, in general who live in areas poorly-served by cell or broadband service.

This latest “tranche” of projects continues to use pseudonyms such as “B1” and “C2” for the project names, turning NYPA’s project list into a guessing game for communities seeking to offer effective input into NYPA’s plans.

In Section 3.1.2, NYPA claims the plan “has been and will continue to be informed by significant stakeholder engagement. NYPA is committed to transparency and ease of access in stakeholder engagement processes.” The obvious obfuscation of project names in the project



list is neither transparent nor easy to use for project identification. Where designations (such as Document Matter Management number) exist from the Office of Renewable Energy Siting and Transmission (ORES) or local siting agencies, such designations should be listed. Additionally, the developer's project name should also be listed.

Further, NYPA does not address to what extent, if at all, the Authority has reached out to the communities targeted by its partner projects. From my own experience, I live in the town of Glen, NY which appears to correspond to Project C3 from the initial tranche. To my knowledge, NYPA has yet to reach out to anyone in Town government regarding the project, its long-range plans, or even its involvement in the project. Similarly, the partner company failed to notify anyone of its listing in the tranche of projects in conjunction with NYPA's release of the previous draft plan and was surprised when residents brought it up at a public meeting several weeks later. Lastly, NYPA's involvement is not a part of the ORES public record except in comments provided by community members.

These communications are essential. As a government authority, not only does NYPA have the right of Eminent Domain, it can pursue tax exempt status for properties it owns. Rural municipalities are already burdened by a tax assessment scheme that requires wind and solar installations be valued at a fraction of what comparable developments of other industries would be valued. NYPA's majority ownership requirement raises uncomfortable questions for municipalities. If there is a possibility that the property might be taken off the tax rolls or that NYPA might condemn adjoining properties, taxing authorities need the time to perform effective financial planning to compensate. In the case where NYPA assumes control of a project following development, how would that impact any PILOT agreements or Host Community Benefit Agreements the developer agreed to?

On page 14, NYPA claims "a strong legacy of community engagement," and continues "Our EJ team works as an internal advocate on behalf of communities to ensure that their concerns are prioritized and incorporated into NYPA's strategic planning." Glen is a Climate Justice workgroup-designated Disadvantaged Community (DAC). The lack of outreach to my community is a direct contradiction to NYPA's claim.

Regarding Partner Identification and Vetting, NYPA lists the description of the characteristics used in its process, but fails to provide additional insight. There is no description of the comparative weighting of the characteristics or the metrics involved to evaluate each. While the referenced RFQ may provide additional information in this regard, NYPA should provide additional guidance in the Plan.

Some of the companies identified through the vetting process have few, if any, completed projects in New York. I fear that lack of accomplishment is likely associated with those "active but struggling" projects (Section 3.16) that NYPA has sought. I am concerned that the financial, socioeconomic and project risk from these potential partnerships is not adequately considered by NYPA.



I believe it unwise for NYPA to commit to bringing “at risk” projects to completion as outlined in Section 3.1.6.1., especially where the project has strong local opposition. Such projects suffer longer timelines and engender unneeded and unwelcome divisiveness in the targeted community.

Instances of active opposition to the project are rising and, increasingly, counties and other taxing districts are coming to the support of town residents. In these cases, NYPA's involvement is likely to exacerbate that risk rather than alleviate it, being seen as additional government overreach. I have personally attended four public statement hearings for projects that are being pursued through ORES. Each of these projects have targeted small communities with populations from approximately 2500 to 5000 residents. All but one had over 200 people in attendance, a huge portion of the resident population. Those of us familiar with local organizations and government can attest to the rarity of getting that many residents to attend any type of community event. The ratio of attendees in opposition to the project compared to those in favor is typically around twenty to one. NYPA should avoid strongly contested projects.

Farmland Protection

On page 47, NYPA notes that it is prevented from participating in projects utilizing lands within an agricultural district or utilizing soils MSG 1-4. Many of the projects that NYPA is partnering with in its initial tranches do indeed consist of lands lying within an Agricultural District and / or utilize lands with MSG 1 - 4. For an example of one such project utilizing in excess of 2000 acres of land in an Ag District, please see various exhibits in Case 23-02972, especially the company's [memo](#) in response to County, Town and intervenor replies indicating some 329 acres of MSG 1-4. It is my belief that this project corresponds to project C3 in NYPA's inventory.

As a technology, agrivoltaics is in its infancy. I am unaware of any agrivoltaics projects on the scale of the larger projects in the NYPA portfolio nor any that have shown true market feasibility. Further, large-scale projects seldom include any plans for agrivoltaics. Finally, NYPA provides no minimum standard for the agrivoltaics project that may be claimed to qualify for such an exemption to the use of Ag lands. NYPA needs to clarify that an exemption that targets hundreds of acres of farmland will not be satisfied by three goats and a pickup truck.

Public comment

Much is made of the idea of "Public Renewables," in commentary on NYPA's plan. NYPA's plans to partner with private for-profit companies to build the initial "tranche" of projects seems to belie this title. Many of these private companies NYPA is partnering with are foreign or out-of-state. The large-scale facilities that will be built will be supported by large contracts from NYSERDA. NYPA lists those contract payments as required to meet costs. The primary



"public" portion of the facilities in these cases will be the public money that is being spent to prop up NYPA's partners.

NYPA needs to better distinguish between the "Sound and Fury" of repeated cookie-cutter comments versus substantive well-considered comments. In our age of technology, it is a simple matter to provide "click here" buttons on websites and emails that can provide a momentary sense of satisfaction of "making a difference" (or whatever wish the solicitor seeks to fulfill) that reflect little more than a successful marketing effort rather than a well-reasoned and mature set of recommendations. NYPA should take into account the number of identical or near identical comments when attempting to recognize the value of public comment and not rely so emphatically on statistical results when undertaking initiatives of such great cost and public impact. Sound engineering and well-substantiated feasibility should rule the day.

November 21 Virtual Public Hearing Comments

Climate Change is real; NY's response, sadly, is not.

Like the State's failed overall plan, this draft "renewables" plan fails due to its narrow focus on unreliable intermittent wind- & solar-based systems and their required adjunct insufficient and dangerous battery storage. A renewables-based grid will exacerbate the use of peaker plants.

Land-based wind & solar facilities are an abject waste of land. One would have to cover the entire island of Manhattan from top to bottom with solar plants to generate less than one-twentieth of the power that NYC requires. Nuclear and hydropower can deliver that much energy using a fraction of the area.

Across the State, you'd need 22 Manhattan Islands covered with solar facilities to meet the solar goals. Most of this would be plunked down on forest & farmland, destroying it. That is the antithesis of the term "renewable."

Sacrificing more and more of our non-renewable farmland and coastline every year for inefficient wind & solar isn't sustainable. A New York festooned with wind & solar facilities, dangerous battery storage, and thousands of miles of new wiring because none of these plants are near where the electricity is needed is downright irresponsible.

NYPA can choose another path. Yes, NYPA's new authority highlights working with ill-described "renewables". However, NYPA retains its authority to pursue efficient hydropower and nuclear – both of which are carbon-free and should be enjoined.

Of these, hydropower is defined as a "renewable". It's reliable, has a smaller footprint, a longer facility life, and requires less material per MWh over that life. NYPA is the leader in hydropower & would check the reliability and renewable boxes if it looked at more of them. Why aren't there any hydropower or micro-hydro projects in the plan?



Further, NYPA operates the Canal Commission. Instead of trying to save unpopular “struggling” private-sector wind & solar projects, NYPA could look at hydro projects that could utilize the Canal and other waterways. Such projects could deliver permanent high-skilled operator jobs that could actually help rebuild communities without wasting lands and coastlines and destroying local Ag- and tourism-based economies.

This draft plan is not ready for prime time and New Yorkers will not be well-served by implementation in its current form.

November 18, 2024 Public Hearing, Albany, NY, *as read.*

As a retired IT Director and engineer, I see risk here.

Financial risk, project risk, plan risk, grid risk.

This plan follows the State’s path of a grid based primarily on wind & solar – a pipe dream that NYSEERDA has already told us will fail to meet the CLCPA goals, and, if implemented, will destabilize the grid and still fail to eradicate gas and oil generating plants.

NYPA has targeted failing and “struggling” projects to partner with. You have decided to provide corporate welfare to private projects that can’t get to the finish line despite enormous financial advantages.

Your vetting process for these partnerships lacks the competitive bidding process that protects us from insider deals and runaway costs. You’re putting NYPA’s gold star financial standing at risk trying to save failing projects.

My town of 2500 souls, Glen, NY, is a DAC. You are partnering with ConnectGen to put a large-scale industrial solar plant there, near tourist attractions like the Erie Canal, Bellinger’s Orchards, and the Auriesville Shrine.

You say the project “Actively benefits DACs”. You haven’t asked us. This public hearing isn’t in Glen. We saw the map. NYPA’s public hearings skip nearly every community targeted by NYPA’s planned large-scale building projects.

Why is that?

There won’t be any good long-term jobs with the Glen project. The temporary construction jobs won’t be local. They’ll bus in from hours away. They’ll bring their own lunches, and won’t stay in the one hotel.

Local governments won’t benefit much, either. The State gives solar & wind facilities a 75% off coupon on their property tax.



We have seen division, instead of benefit. [Division] between those making deals with the company and those opposing the devastating impacts to our community character and its economic, cultural, visual, environmental, and spiritual health. Families divided. Long-term relationships ruined. 17-year-olds & 90-year olds alike visibly upset. Tears because the lands and vistas they grew up with will be paved with glass and steel.

The only comments on ORES' website in favor are from folks whose families have leased or sold, or who are getting "good neighbor agreement" financial inducements.

ConnectGen isn't committed to New York like you and me. They're from Houston – the home of the oil industry. The VC firm that created them is heavily involved with gas and oil drilling. They're here for the money. And now, they've been bought by Spanish company Repsol.

To my knowledge, ConnectGen has yet to build a single operating plant. A different listed developer is an ancient leftover from Article 10. Is this how NYPA builds a "stable of qualified developers"?

NY needs a diverse set of solutions to reduce its carbon footprint. Your wholesale giveaway of our dollars and once-abundant lands to foreign and out-of-state wind & solar companies will bring ruin, not only to my community, but to all New Yorkers.



New York Energy Alliance

2024 Conferral Statement

Thank you for reaching out to us for our opinion on this matter. Our answer to the stated questions is informed by the recent [interview](#) given by your VP of Renewable Project Development and the recent PSC report that states NY's CLCPA 2030 renewable goal will not be met. This announcement has spurred many to call on NYPA to use its new authority from the BPRA to fill this gap.

We at NYEA feel that NYPA is moving at a correct pace, and that no pace is possible to reach a goal that was from the beginning unrealistic. NYPA has set a timeline and is working to understand the best way for it to use its unique advantages to produce renewable energy in New York while being mindful of public perception. From our first conversation with NYPA, we feel NYPA does not want to ram rod development through localities that do not want it, and its process thus far is indicative of that. As stated in the above mentioned interview, the BPRA does not force NYPA to step in if the 2030 goals are declared unreachable, as the bill's most ardent supporters try to characterize. To even attempt to do so will cause the public relations nightmare NYPA has wanted to avoid from day one.

Also, it should be made clear, NYPA does not own any renewable manufacturing capacity. It is affected by the same supply chain delays and cost overruns as any other developer. NYPA cannot magically make a turbine or panel appear, their absence a core reason for the delays.

NYEA maintains the same position that NYPA should look to re-enter nuclear generation, especially looking forward to the CLCPA 2040 goals. NYPA seems very willing to enter public-private partnerships, maybe one avenue could be partnering with NY's last nuclear operator, Constellation, on a joint project.

With this most recent announcement, we believe the State should re-assess its goals and set ones that are achievable and serve the actual interests of New Yorkers: reliable, cheap, abundant electricity for all New Yorkers. As for NYPA, it should stay the course it is on until such time more sensible heads prevail. NYPA cannot perform miracles, it is too busy delivering electrons.

November 21 Virtual Public Hearing Comments

Hello All, I am Brian Wilson, representative of New York Energy Alliance and participant in the conferral process already held. Since our position has already been captured, my brief statement will be offered to maintain a sense of balance in these public comments.



We would like to reiterate that we feel NYPA is doing its best to implement its new renewable mandate while also acknowledging the physical realities of the grid. However, it is becoming evident that even this conservative approach is pleasing no one.

On one hand the BPRA's most ardent supporters see NYPA as not doing enough and are pushing for more aggressive renewable generation targets, reality be damned.

On the other, we have heard from fellow organizations that NYPA has backed projects opposed by their local communities, leading to a feeling that there is now yet another state org they have to fight to keep an unpopular project away.

With this being the state of play, we reiterate NYPA needs to be judicious in the projects it funds, looking for impacted community input wherever it can, and take past rejections into account. Also, we explore NYPA to look at its own history to build where it has expertise: nuclear, hydro, and transmission. These reliable infrastructure projects would immensely improve the state of the grid and the lives of all New Yorkers.

Thank you for the opportunity to speak tonight.



Ginger Schroder, Cattaraugus County Legislator

September 12, 2025 Conferral Comments

(Please see attached GDS Conferral letter.pdf)

August 14, 2024 Conferral Comments (with Gary Abraham and Benjamin Wisniewski)

(Please see attached AbrahamSchroderWisniewski2024.PDF)

November 21, 2024 Virtual Public Hearing Comments (Full Script)

My name is Ginger Schroder and I am a private attorney representing municipalities and citizen groups in solar, wind and battery storage projects and I am also a Cattaraugus County Legislator, representing 77,000 rural New York constituents. I also serve as a Board Member of the Industrial Development Agency for my county. The first one minute of my comments will be directed to the agency's Strategic Plan generally. The remaining two minutes will be directed to a specific project identified by the Plan.

NYPA has been an efficient reputable public entity that has provided NYers with reliable, affordable electricity by building and operating large hydropower plants and various electric infrastructure projects. NYPA even helped to develop nuclear power. NYPA's draft plan will leverage its good credit to help rescue about 31 private-sector large-scale solar/wind/battery projects. It would also build about 9 such projects itself. Achieving carbon-free electricity requires firm reliable power. Bleeding more public money and resources into intermittent generation not only jeopardizes reliability and affordability, but also ensures that NY will remain dependent on fossil fuels. NYPA's good reputation for developing cost efficient and reliable power will be sullied by its devolvement into doubling down on solar and wind. Unless we have more firm, reliable dispatchable sources like nuclear and hydro, we will not be able to end our reliance on fossil fuel...EVER. Instead NYPA should do what it has historically done best by working on RELIABLE public projects for the common good. That isnuclear energy, hydro and infrastructure.

Now I wish to discuss the sole wind project identified by NYPA in its plan. The big purple



hexagon located in my county. I will point out that the project is wrongly identified in the written plan as a solar project labeled E-1. But the project is unquestionably the Alle Catt Invenergy Wind Project being developed in my county by a very troublesome Company. This is your headline: NYPA picks the most unpopular most divisive renewable project in the state as its flagship wind project.

It should be corrected and in the interest of transparency, the projects in NYPAs plan should bear their actual names, from ORES, Article 10 and otherwise.

I am glad that NYPA is doing its due diligence. The Alle Catt developer tricked many leaseholders into signing leases by telling them that this project was going to be built no matter what, and that it was not dependent upon a payment in lieu of taxes agreement from the IDA and that therefore they should sign the lease being offered to get something for themselves instead of nothing. This year, we learned that this is false. The developer has come to my IDA and requested tens of millions of dollars in tax breaks and has said that the project is now in jeopardy unless we induce the project.

NYPA needs to know the developer it is getting into bed with and that the public will now associate you with. This developer entered into financial contracts benefitting municipal officials and their family members without publicly disclosing as they were required to do, that these municipal officials pushing the project on their constituents and voting on wind laws favorable to the project, had financial contracts in the project. Overnight after the AG investigation the conflict list went from 2 to 13.



Sheila Salvatore

November 18, 2024 Public Hearing

Good morning. My name is Sheila Salvatore and I reside in Sauquoit. I've been fighting industrial wind for over 15 years. A foreign developer now wants to blanket 20,000 acres of my area with wind turbines. I'm here today to ask that the New York Power Authority protect our rural and suburban communities from the unwise and detrimental impacts of the vast land required for industrial wind and solar and reject the notion of using eminent domain for such projects.

We must recognize that wind turbines and solar panels aren't reliable or stable forms of power generation due to the nature of these resources. Both are intermittent and require great amounts of land for what is in the end an inadequate resource.

Our state's load demand is increasing and in the case of chip plants in particular, a power intermittency of nanoseconds is a serious problem. For example, Wolfspeed, a power transistor manufacturer in Marcy, NY, chose that site in part because of the transmission infrastructure located there. That plant has six independent power inputs and can run on any one of them. Still, fearing a brief loss of power, it has additional natural gas-powered on-site generation plants. This level of power supply security is necessary to operate a chip plant, and if this is to be a growth sector of NY's industrial base, anything which contributes to power intermittency must be discouraged (wind and solar), and that which meaningfully contributes to base power reliability (nuclear and hydro) must be encouraged.

There was no surprise that when Indian Point was closed, NYS went from 61% carbon neutral power to 50% overnight. We need nuclear power and are excited for advanced nuclear power development to meet our growing electric power needs and industrial development objectives, all while preserving the health and character of our rural and suburban communities from energy sprawl.

Please do your part to protect NYS from this incredible waste of our tax dollars and land.





Comments on New York Power Authority's (NYPA) Renewables Updated Strategic Plan
September 11, 2025
Submitted by Martha Sickles

Thank you for the opportunity to comment on New York Power Authority's (NYPA) Renewables Updated Strategic Plan drafted in compliance with the Build Public Renewables Act (BPRA). Urbecon LLC, provides sustainable planning and development services. In collaboration with coalitions and local organizations, we advocate for legislative, regulatory, and financial tools to facilitate building decarbonization and affordable energy statewide with a special focus on New York City.

We supported the Build Public Renewables Act, passed in 2023 granting NYPA broad powers and funding to:

- accelerate the development of renewable energy to meet the goals of the CLCPA,
- support workforce training and services to grow the quantity and quality of renewable energy employment,
- establish the Renewable Energy Access and Community Help (REACH) program to provide bill credits for low- and moderate-income ratepayers, particularly those in disadvantaged communities served by investor-owned utilities.¹

These are important goals critical to our work as building decarbonization is only an effective strategy with a clean energy fueled electric grid. We offer comments and suggestions to the implementation strategy laid out in this updated plan.

The BPRA affords NYPA a great opportunity to lead by example to further the goal of the CLCPA to power the electric grid with renewable energy by 2040 and the interim goal of 70% clean power by 2030. Meeting this goal requires an increase of 15 GW of renewable energy. We appreciate NYPA's success in updating the plan to double the previously proposed 3.5 GW of renewable energy to 7 GW within a year. This rapid escalation indicates a capacity to reach higher target of 15GW quickly with private, government and institutional support.

¹ Build Public Renewables Act, <https://www.nysenate.gov/legislation/bills/2023/S4134>

With the Federal attack on renewable energy and climate action, NYPA must intensify its efforts to build public renewables that will reduce pollution, increase energy affordability, and mitigate climate change. In July, in response to Trump's executive order to stop construction of new offshore wind projects and review existing wind energy leases, the New York State Public Service Commission cancelled the Public Policy Transmission Need determination that called for new power lines to deliver at least 4,770 megawatts of offshore wind energy to the downstate grid. Last month, the PSC denied NYPA's request to designate the Clean Path Transmission Project as a Priority Transmission Project. We hope NYPA will be able to continue with this project critical to clean New York City's grid. Reduced transmission lines increase the need for more projects in New York City.

The updated plan includes 61 individual projects up from 40 in the first plan, consisting of solar PV and wind, and three portfolios containing an additional 152 distributed energy storage projects, in every region of the State. Only one solar project was added in Queens, NYC that will be self-developed by NYPA. It is heartening that there are additional inland wind and battery storage projects that must be appropriately introduced to their host communities.

Across the nation, state and local governments are reviewing and changing local zoning and regulations to remove barriers to the development of sorely needed affordable housing and energy efficiency and renewable energy projects. NYS's RAPID Act is one example that will facilitate renewable energy project siting. Recently NYC passed the three-pronged City of Yes for Carbon Neutrality, Housing and Economic Opportunity that facilitates the siting of renewable energy projects including battery storage facilities and building electrification projects but not without controversy. There is community opposition to some of the proposed battery storage facilities that must be addressed through public education as to the safety of battery storage facilities and how they contribute to creating healthier homes and neighborhoods by reducing the need for polluting fossil fuel powered generation. We urge NYPA to work with local elected officials and community groups in this effort and we offer our assistance.

Abundant renewable energy generation is necessary for NYPA to close all its fossil fuel powered generation assets by 12/31/2030. Closing the seven-gas fueled generating plants at a production capacity of 517 MW², most located in disadvantaged communities

² 2024 Reliability Needs Assessment (RNA), A Report from the New York Independent System Operator, November 19, 2024, p. 26-27, <https://www.nyiso.com/documents/20142/2248793/2024-RNA-Report.pdf/0fe6fd1e-0f28-0332-3e80-28bea71a2344>

in New York City and Long Island, requires rapid development of local renewable replacement generation. The New York ISO's 2024 Reliability Needs Assessment forecasts that increasing demand growth coupled with the proposed retirement of NYPA's plants would result in no surplus power by 2034 without further resource development."³

The draft plan indicates your intention to partner with communities in developing distributed energy resources. We hoped this updated plan would lay out more specific plans and timelines for engaging local organizations in project development as well as NYPA customers: New York City, the MTA, the Port Authority, and others. There are great opportunities for NYPA to build large amounts of highly and quickly profitable renewable energy resources in NYC, offsetting financial risks of borrowing and allowing for more leveraging of municipal and institutional support. NYPA can support NYC to meet its LL97 requirements through decarbonizing NYC buildings including public schools by siting utility scale and distributed generation in K-12 schools and in industrial parks. NYPA can and should partner with CUNY and Suny institutions.

We collaborate with NYPA's excellent legislative and environmental justice staff to provide community energy education. These teams could expand their work in community engagement to facilitate local project planning to include distributed generation, micro-grids, geothermal and thermal energy networks.

We support expanding the portfolio of projects that will contribute to the REACH program. The proposed elimination of funding to the Federal Low Income Home Energy Assistance Program (LIHEAP) in the FY2026 budget hopefully will be at least partially restored and the NYS Office of Temporary and Disability Assistance projects the same level of funding as last year. However, the firing of program staff will affect program operations making the REACH provision of renewable energy bill credits to low- and moderate-income families, particularly those in Disadvantaged Communities more essential. As it will take time for any significant level of funding to be generated, there is opportunity to consider efficient and effective mechanisms for funding targets. One option is providing bill supplements for gas customers who electrify their buildings to cover operational increases due to the higher cost of electric heating. We suggest collaboration with advocates including the Public Interest Law Project to design the program in the most transparent and cost-effective manner that will align with existing energy assistance programs, Solar for All, and the utilities Energy Affordability Programs, to facilitate maximum participation and avoid customer confusion.

³ Ibid, p.6

As the federal government intensifies its efforts to remove funding, financing, and tax benefits for renewable energy projects, we hope NYPA will fast track projects to take advantage of waning tax credits and look for alternative mechanism to fill any funding gaps.

Thank you for the opportunity to testify on this important plan. We are available for further discussion and collaboration to advance this important work.