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May 1, 2026

VIA ELECTRONIC FILING

Hon. Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case 22-M-0149 Proceeding on Motion of the Commission Assessing Implementation of and Compliance with the Requirements and Targets of the Climate Leadership and Community Protection Act, et al.

Dear Secretary Phillips:

On January 6, 2026, the Coalition for Safe and Reliable Energy (“Coalition”) filed a Petition requesting that the Public Service Commission (“Commission”) hold a hearing pursuant to Public Service Law § 66-p(4) to evaluate whether to temporarily suspend or modify the obligations under the Renewable Energy Program established as part of the Climate Leadership and Community Protection Act (“CLCPA”). The City of New York (“City”) respectfully submits these comments regarding the Petition.

The City understands that federal actions and changing economic conditions are impeding the State’s compliance with the emissions reduction and clean energy goals set forth in the CLCPA. Despite those setbacks, the State should continue to pursue initiatives that are within its control, such as expanding energy efficiency programs, encouraging and facilitating the deployment of energy storage, and supporting the development of renewable energy projects, including expanding the bulk transmission system. None of these no-regrets approaches may independently fill the forecasted capacity gaps, but State agencies should work with the New York Independent System Operator (“NYISO”) and other stakeholders to assess their cumulative potential to narrow the gap and augment each other to maximize benefits for New Yorkers. The City is enthusiastic to partner with the State in advancing these initiatives.

A recent presentation to the Federal Energy Regulatory Commission (“FERC”) by its Staff underscores the need for the State to continue its efforts. That presentation, which was made at the FERC’s March 19, 2026 open session, shows that peak load in New York grew by 9.9 percent

from 2024 to 2025, a larger growth rate than in any other region of the country.¹ At the same time, there were only 300 megawatts (“MW”) of net capacity additions in 2025, less than any other region of the country. Similarly, there was minimal new transmission investment in New York—much less than in any other region. Recent analyses by Consolidated Edison Company of New York, Inc. and the NYISO reveal potential reliability problems over the next five to ten years as the demand for electricity exceeds the available supply. In recent comments to the Commission regarding how to address these reliability needs, the City advocated that the Commission pursue all of the initiatives mentioned above—an approach that increases the electric grid’s capacity through new transmission lines, reduces New York City’s energy demand through energy efficiency measures, and increases renewable energy and energy storage project deployment.²

As the Commission seeks to address the growing need for electricity, it should proceed in a manner that takes into account important public policy goals. It also should proceed in a manner that gives due consideration to the mandate of Public Service Law §65(1) that utility rates be just and reasonable. Indeed, affordability is a primary concern of the City, and every reasonable effort should be taken to make the cost of utility service affordable to all New Yorkers. Thus, a balance is needed between these important principles.

The City, itself, has had to consider a similar balance. For many years, the City has been at the forefront of combatting climate change and taking reasonable and appropriate steps to reduce greenhouse gas (“GHG”) emissions. In 2019, prior to the enactment of the CLCPA, the City had commenced its own effort to transition away from fossil fuels and promote and foster decarbonization efforts. The City enacted the Climate Mobilization Act, which comprised a series of local laws to reduce emissions within New York City by 40 percent and eliminate six million tons of GHG emissions by 2030, create tens of thousands of new green jobs, prevent hundreds of hospital visits and deaths annually by improving air quality, and reduce citywide emissions by 80 percent by 2050. This commitment was thereafter strengthened to carbon neutrality citywide by 2050.

The centerpiece of the Climate Mobilization Act is Local Law 97 of 2019, which places increasingly stringent caps on GHG emissions from buildings over 25,000 square feet. Resulting from the deep technical and compliance support that the City has provided to building owners, 94 percent of buildings complied with reporting requirements under Local Law 97 for 2025, and the City has recently relaunched an improved NYC Accelerator that brings deeper resources and

¹ The presentation is available at <https://www.ferc.gov/news-events/news/presentation-3-state-markets-report>.

² See Case 25-E-0764, Proceeding on Motion of the Commission to Address New York City Reliability Needs, Comments of the City of New York on Consolidated Edison Company of New York, Inc.’s Reliability Needs Report (filed March 6, 2026).

technical support to buildings working to decarbonize and comply with Local Law 97 to reduce the cost of compliance.

More broadly, the City's strategic plan for protecting residents from climate threats and transitioning to a green economy is set forth in *PlaNYC: Getting Sustainability Done*, which was released in April 2023.³ Specific to energy matters, the City released *PowerUp NYC* in September 2023. *PowerUp* is a roadmap guiding the City's efforts to reduce GHG emissions and achieve its clean energy policy goals.⁴ It addresses affordability of building electrification, managing charging and vehicle-to-grid opportunities, use of public lands for clean energy development, factors related to increasing electricity demand due to electrification, and the role of energy storage.

The City is leading by example through over \$1 billion in energy efficiency measures, which have reduced GHG emissions of City government operations 25 percent from a 2006 baseline. The City is committing billions of dollars to electrifying City buildings and vehicle fleets, including \$3.5 billion to complete or progress 100 public school electrification projects by 2030. The City's actions have been emulated by private developers, as GHG emissions throughout New York City have declined by 17 percent. Other City actions include installing over 32 MW of solar arrays on municipal buildings,⁵ training City employees on ways to use energy more efficiently, and using strategic planning to prioritize and streamline energy-related projects and align capital investments with climate mitigation goals.⁶

The City understands the challenge of meeting ambitious mandates in the face of competing priorities and changing economic landscapes, as well as the challenge of developing practical and tailored programs and policies that meet changing needs while advancing a clean energy future. While the City is a leading proponent of the transformation and decarbonization of the electric system, the City is an equally strong proponent of affordability and of preserving and

³ *PlaNYC* can be found at <https://climate.cityofnewyork.us/initiatives/planyc-getting-sustainability-done/>.

⁴ *PowerUp NYC* can be found at <https://climate.cityofnewyork.us/initiatives/powerupnyc/>.

⁵ The NYC Department of Citywide Administrative Services has built 197 solar projects on New York City property, and it is developing another 140 projects that will add 41.3 MW of new solar arrays.

⁶ In collaboration with the Sanitation Department's transformative mandatory organics collection, the NYC Department of Environmental Protection has built groundbreaking infrastructure to convert the methane emitted as an unavoidable byproduct of processing wastewater and organics into renewable natural gas that can feed directly into the City's gas distribution infrastructure.

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strengthening electric system reliability and resiliency. Affordable, reliable, and resilient energy infrastructure is necessary to protect public health and welfare and improve New Yorkers' quality of life. To this end, the City is eager to partner with the State to deploy creative solutions to equitably transition to clean energy, secure investments that modernize the energy grid, and address the needs of New Yorkers most impacted by climate change.

The City is enthusiastic to continue to work with the Commission, Department of Public Service Staff, and stakeholders to develop an approach that balances all of the considerations discussed herein.

Thank you for your consideration of these comments.

Respectfully submitted,

Samantha A. Maurer

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Dated: May 1, 2026
Albany, New York