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April 24, 2026

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

Re: **Re: Case 15-E-0302, Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and Clean Energy Standard**
Indicated Utilities' Comments on Commission's Questions Regarding Utility Ownership of Renewable Generation

Dear Secretary Phillips,

The Indicated Utilities¹ respectfully submitted the attached comments in response to the Public Service Commission's Notice Soliciting Comments on utility ownership of generation and the comprehensive review of the State's renewable solicitation practices.²

Thank you for your consideration in this matter.

Respectfully submitted on behalf of the
Indicated Utilities,

/s/ Christian Malanga
Christian Malanga
Senior Attorney

¹ The Indicated Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, and Orange & Rockland Utilities, Inc.

² Case 15-E-0302 *et al.*, *Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard*, Notice Soliciting Comments (issued January 27, 2026). On February 5, 2026, the Secretary extended the comment deadline to March 27, 2026, and on March 26, 2026, further extended the comment deadline to April 24, 2026 (*Case 15-E-0302*, Notice Extending Deadline (issued February 5, 2026); Notice Further Extending Deadline (issued March 26, 2026)).