



# **WETHERSFIELD WIND REPOWERING PROJECT**

**MATTER NO. 23-03034**

**16 NYCRR § 1100-2.19 Exhibit 18**

**Socioeconomic Effects**

**TABLE OF CONTENTS**

18.0 EXHIBIT 18 – SOCIOECONOMIC EFFECTS ..... 18-1

    SUMMARY OF EXHIBIT ..... 18-1

    18.1 DEMOGRAPHICS, EMPLOYMENT, AND EXPENDITURES (16 NYCRR § 1100-2.19) ..... 18-1

        18.1.1 Construction Workforce (16 NYCRR § 1100-2.19(a))..... 18-3

        18.1.2 Construction Payroll and Expenditures (16 NYCRR § 1100-2.19(b))..... 18-4

        18.1.3 Operations Workforce, Payroll, and Expenditures (16 NYCRR § 1100-2.19(c)) ..... 18-4

    18.2 SCHOOL DISTRICTS OPERATING AND INFRASTRUCTURE COSTS (16 NYCRR § 1100-2.19(d))..... 18-7

    18.3 MUNICIPAL OPERATING AND INFRASTRUCTURE COSTS (16 NYCRR § 1100-2.19(e))..... 18-8

    18.4 IDENTIFICATION OF JURISDICTIONS THAT LEVY REAL PROPERTY TAXES OR BENEFIT ASSESSMENTS OR USER FEES (16 NYCRR § 1100-2.19(f)) ..... 18-10

    18.5 PAYMENTS IN LIEU OF TAXES, BENEFIT CHARGE REVENUES, AND USER CHARGE REVENUES (16 NYCRR § 1100-2.19(g)) ..... 18-10

    18.6 COMPARISON OF COSTS TO JURISDICTIONS AND REVENUE GENERATED BY THE FACILITY (16 NYCRR § 1100-2.19(h)) ..... 18-11

    18.7 LOCAL EMERGENCY RESPONSE CAPACITY (16 NYCRR § 1100-2.19(i)) ..... 18-12

    18.8 STATE SMART GROWTH PUBLIC INFRASTRUCTURE CRITERIA (16 NYCRR § 1100-2.19(j))..... 18-12

    18.9 HOST COMMUNITY BENEFITS (16 NYCRR § 1100-2.19(k)) ..... 18-15

    18.10 UNIFORM STANDARDS AND CONDITIONS ..... 18-17

    18.11 REFERENCES..... 18-17

## LIST OF TABLES

Table 18-1	Demographics .....	18-2
Table 18.1-1	Estimated Construction Quarterly Full-Time Equivalent Averages .....	18-3
Table 18.1-2	Average Full-Time Equivalent and Estimated Payroll during Construction (millions) .....	18-4
Table 18.1-3	Non-Payroll Expenditures during Construction .....	18-5
Table 18.1-4	Full-Time Equivalent Employees and Estimated Payroll during Operations .....	18-5
Table 18.1-5	Estimated Non-Payroll Expenditures during Operations .....	18-6
Table 18.5-1	Distribution of PILOT Payments .....	18-11
Table 18.10-1	Applicable Uniform Standards and Conditions for Socioeconomics .....	18-17

## LIST OF APPENDICES

Appendix 18-A	School District Consultation.....	A-1
---------------	-----------------------------------	-----

## ACRONYM LIST

ECL	New York State Environmental Conservation Law
FTE	full-time equivalent
GHG	greenhouse gas
kV	kilovolt
MW	megawatt
NYCRR	New York State Codes, Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
PILOT	payments in lieu of taxes

## GLOSSARY TERMS

Key terms used frequently in this Application are defined below:

**Applicant:** Means Valcour Wethersfield NewCo, LLC.

**Existing Facility:** Refers to the existing 126-megawatt (MW) wind energy facility and its components located in the Towns of Eagle and Wethersfield, Wyoming County, New York, and commonly known as the Wethersfield Windpark.

**Facility Site:** Refers to those privately owned parcels under option to lease, purchase, create an easement, or other real property interests with the Applicant on which all Repowered Facility components will be sited, including roads, collector lines, and interconnection with the electrical grid.

**Limits of Disturbance:** Refers to the portion of the Facility Site that will necessarily be utilized to facilitate construction and operation of the Repowered Facility, including temporary workspaces.

**Repowered Facility:** Refers to the Wethersfield Wind Repowering Project, an approximately 136 MW wind energy generation facility located in the Towns of Eagle and Wethersfield, Wyoming County, New York, that will consist of new wind turbines, access roads, buried electric collection lines, collection substation facility improvements, temporary laydown and parking, permanent meteorological towers, and an aircraft detection lighting system tower. The Repowered Facility will reuse other existing aboveground components, including overhead collection lines, access roads, an operations and maintenance building, a 34.5-kilovolt (kV) to 230 kV collection substation; and a point of interconnection switchyard station owned by New York State Electric and Gas (NYSEG).

**Study Area:** Refers to the area evaluated for specific resource identification and/or resource impact assessment. The size of this area is appropriate for the target resource and takes into account the project setting, the significance of the resource or impact being identified or evaluated, and the specific survey distances included in 16 New York Codes, Rules, and Regulations Part 1100. Unless indicated otherwise in a specific exhibit, the Study Area represents the area within a 5-mile radius of the Facility Site.

## 16 NYCRR § 1100-2.19 Exhibit 18 Socioeconomic Effects

Exhibit 18 Information	Found in Section
<b>Exhibit 18 shall contain:</b>	
a. An estimate of the average construction work force, by discipline, for each quarter, during the period of construction; and an estimate of the peak construction employment level.	18.1
b. An estimate of the annual construction payroll, by trade, for each year of construction and an estimate of annual direct non-payroll expenditures likely to be made in the host municipality(ies) (materials, services, rentals, and similar categories) during the period of construction.	18.2
c. An estimate of the number of jobs and the on-site payroll, by discipline, during a typical year once the facility is in operation, and an estimate of other expenditures likely to be made in the host municipality(ies) during a typical year of operation.	18.3
d. An estimate of incremental school district operating and infrastructure costs due to the construction and operation of the facility, this estimate to be made after consultation with the affected school districts.	18.4
e. An estimate of incremental municipal, public authority, or utility operating and infrastructure costs that will be incurred for police, fire, emergency, water, sewer, solid waste disposal, highway maintenance and other municipal, public authority, or utility services during the construction and operation the facility (this estimate to be made after consultation with the affected municipalities, public authorities, and utilities).	18.5
f. An identification of all jurisdictions (including benefit assessment districts and user fee jurisdictions) that levy real property taxes or benefit assessments or user fees upon the facility site, its improvements and appurtenances and any entity from which payments in lieu of taxes will or may be negotiated.	18.6
g. For each jurisdiction, a description of the host community benefits to be provided, including an estimate of the incremental amount of annual taxes (and payments in lieu of taxes, benefit charges and user charges) it is projected would be levied against the post-construction facility site, its improvements and appurtenances, payments to be made pursuant to a host community agreement or other project agreed to with the host community.	18.7
h. For each jurisdiction, a comparison of the fiscal costs to the jurisdiction that are expected to result from the construction and operation of the facility to the expected tax revenues (and payments in lieu of taxes, benefit charge revenues and user charge revenues) generated by the facility.	18.8
i. An analysis of whether all contingency plans to be implemented in response to the occurrence of a fire emergency or a hazardous substance incident can be fulfilled by existing local emergency response capacity, and in that regard identifying any specific equipment or training deficiencies in local emergency response capacity (this analysis to be made after consultation with the affected local emergency response organizations).	18.9
j. A detailed statement indicating how the proposed facility and interconnections are consistent with each of the State smart growth public infrastructure criteria specified in ECL Section 6-0107, or why compliance would be impracticable.	18.10
k. A statement as to the host community benefit(s) to be provided by the applicant.	18.11

## 18.0 EXHIBIT 18 – SOCIOECONOMIC EFFECTS

### SUMMARY OF EXHIBIT

Valcour Wethersfield NewCo, LLC (the Applicant) assessed the potential socioeconomic effects associated with the construction and operation of the Repowered Facility. The Study Area for socioeconomics consists of Wyoming County and the Towns of Eagle and Wethersfield as the communities hosting the Repowered Facility Site. The Applicant anticipates that construction will occur over approximately 24 months and generate an average of 71 full-time equivalent (FTE) jobs and a peak of 96 FTE jobs; with estimated fully burdened annual earnings of \$8.9 million. Six FTE jobs are anticipated for technicians, administrative, and site management, and estimated fully burdened annual earnings of \$300,000. The Applicant expects that the majority of these construction jobs will be filled by residents of New York State and will endeavor to hire locally within Wyoming County. The operation and maintenance of the Repowered Facility will not increase the number of full-time employees as compared to the Existing Facility.

The Applicant consulted with the host communities to identify potential impacts on local services. Construction and operation of the Repowered Facility will result in minor, if any, increases in demand for local services and corresponding municipal costs.

The Applicant consulted with the Hamlet of Bliss Fire Department, on April 4, 2025, to review the Repowered Facility design. Consultation with the Fire Department regarding the design, response capacity, and training is ongoing and consistent with the practices of the existing operating wind project.

The Repowered Facility is a privately funded energy project that will not result in the construction or operation of public infrastructure and will not result in unnecessary sprawl; however, this analysis provides a detailed statement regarding the Repowered Facility’s consistency with the smart growth criteria in New York State Environmental Conservation Law (ECL) Section 6-0107.

The Repowered Facility will continue to provide positive impacts on public welfare through employment opportunities and indirect economic opportunities as a result of the clean energy transition. The Applicant estimates that the average annual payments in lieu of taxes (PILOT) and property tax will total **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION**

### 18.1 DEMOGRAPHICS, EMPLOYMENT, AND EXPENDITURES (16 NYCRR § 1100-2.19)

Population and economic conditions within Wyoming County and the Towns of Eagle and Wethersfield are summarized in Table 18-1.

**Table 18-1 Demographics**

	<b>Town of Eagle</b>	<b>Town of Wethersfield</b>	<b>Wyoming County</b>	<b>New York State</b>
<b>Population</b>				
2010 Population	1,192	883	42,155	19,378,102
2020 Population	1,105	755	40,531	20,201,249
Median age	38.0	44.6	43.1	40.2
Veterans	10.9%	9.6%	7.2%	3.6%
<b>Race and Ethnicity</b>				
White	1,052	723	36,046	11,143,349
Black or African American	1	0	1,999	2,986,172
American Indian/Alaska Native	4	0	98	149,690
Asian	4	2	218	1,933,127
Native Hawaiian/Other Pacific Islander	0	0	6	10,815
Two or more races	25	25	1,570	1,767,463
Some Other Race	19	5	594	2,210,633
Hispanic or Latino (any race)	14	17	1,490	3,948,032
<b>Housing</b>				
Total housing units	524	482	18,186	8,488,066
Owner-occupied units, rate	81.1%	76.4%	77.0%	54.1%
<b>Income</b>				
Median household income (2023\$)	\$63,375	\$79,750	\$68,913	82,095
Individuals below the poverty level	15.3%	8.9%	10.6%	14.2%

Source: U.S. Census Bureau 2023.

The Applicant developed estimates of the workforce needed for the construction of the Repowered Facility based on the Existing Facility and similarly sized projects. The Applicant based the estimates below on experience developing and repowering other wind projects, and considered the following factors:

- Project location;
- Year of construction;
- Direct current nameplate capacity;
- Base installed system cost;
- Annual direct operations and maintenance cost;
- Actual construction and workforce estimates; and
- Actual hourly wages and benefits for the construction and operations workforce.

### 18.1.1 Construction Workforce (16 NYCRR § 1100-2.19(a))

The Applicant anticipates that construction will last approximately 24 months and require an annual average of 71 FTE jobs and a peak of 96 FTE jobs. Table 18.1-1 provides a breakdown of the average FTE jobs for each quarter during construction, as well as total FTE jobs by discipline.

Local, regional, and statewide employment during the construction phase will primarily benefit those in the construction trades, including equipment operators, truck drivers, laborers, and electricians. The Applicant expects that most of these construction jobs will be filled by residents of New York State. The Repowered Facility's construction will also require workers with specialized skills, such as crane operators, wind energy facility assemblers, specialized excavators, and high-voltage electrical facility workers. The Applicant will hire residents within the labor market area to fill highly specialized positions (i.e., engineers and other professional services) to the extent possible. Workers located outside the labor market area will be expected to remain in the region only for the duration of construction.

**Table 18.1-1 Estimated Construction Quarterly Full-Time Equivalent Averages**

Type of Job	Q1	Q2	Q3	Q4	Q5	Q6
Laborers	4.6	9.0	18.1	9.0	4.6	9.0
Electricians	4.3	8.6	17.2	8.6	4.3	8.6
Equipment Operators	3.6	7.0	14.2	7.0	3.6	7.0
Construction Managers	0.6	1.2	2.3	1.2	0.6	1.2
Ironworkers	4.9	9.8	19.6	9.8	4.9	9.8
Millwrights	0.4	0.7	1.6	0.7	0.4	0.7
Foremen	1.4	2.7	5.5	2.7	1.4	2.7
Engineering, Design, and Related Professional Services	4.3	8.7	17.4	8.7	4.3	8.7
<b>Total<sup>1</sup></b>	<b>24.0</b>	<b>47.7</b>	<b>95.9</b>	<b>47.7</b>	<b>24.1</b>	<b>47.7</b>

Source: AES internal historic workforce estimates

Note:

<sup>1</sup> Totals may not sum due to rounding.

### 18.1.2 Construction Payroll and Expenditures (16 NYCRR § 1100-2.19(b))

Table 18.1-2 provides estimates of the annual construction earnings by trade. The Applicant estimates a total of \$8.9 million for annual earnings of the 71 on-site construction jobs for New York residents for each year of construction. Estimated earnings represent total wages and salary compensation paid to New York State and Wyoming County employees (i.e., wages plus average annual overhead costs, including Supplemental Security Income, Medicare, workers’ compensation, and disability). Project development and on-site labor earnings would be realized by New York State and Wyoming County residents engaged in the construction of the Repowered Facility, including the construction, engineering, and professional services trades.

**Table 18.1-2 Average Full-Time Equivalent and Estimated Payroll during Construction (millions)**

Type of Job	Statewide Earnings	Wyoming County Earnings
Construction and Interconnection	\$7.4	\$1.8
Engineering, Design, and Professional Services	\$1.5	\$0.2
<b>Total FTE</b>	<b>\$8.9</b>	<b>\$2.1</b>

Source: AES internal historic payroll estimates

Notes:

<sup>1</sup> Estimated payroll represents total wages and salary compensation, including benefits.

Key:

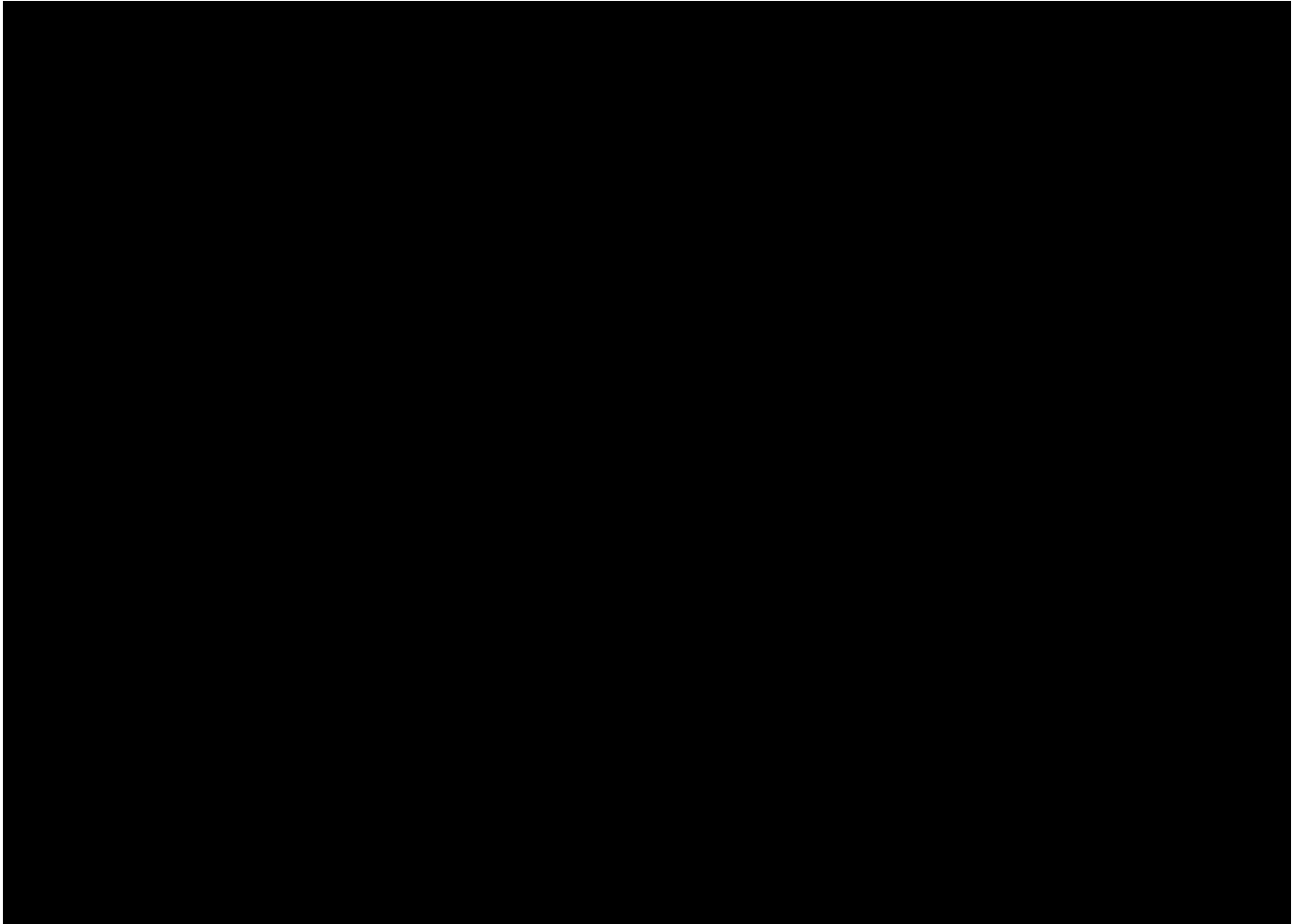
FTE = full-time equivalent

The Applicant estimates that direct non-payroll expenditures in the Study Area during the period of construction will include the electrical balance of the Repowered Facility equipment, and materials and equipment rentals related to roads, foundations, and fencing. Other development costs, such as legal fees and insurance, are also expected to be expended within the host communities. Table 18.1-3 provides an estimate of expenditures in New York State and the host communities.

### 18.1.3 Operations Workforce, Payroll, and Expenditures (16 NYCRR § 1100-2.19(c))

The operation and maintenance of the Repowered Facility will not increase the number of full-time employees compared to the Existing Facility. Non-labor expenditures made in the host communities will generally include maintenance activities and include tools or services for cleaning and landscaping. Table 18.1-4 provides an estimate of payroll during operations, and Table 18.1-5 provides an estimate of expenditures for the Repowered Facility.

**Table 18.1-3 Non-Payroll Expenditures during Construction**  
**BEGIN CONFIDENTIAL INFORMATION <**



**> END CONFIDENTIAL INFORMATION**

**Table 18.1-4 Full-Time Equivalent Employees and Estimated Payroll during Operations**

Type of Job	FTE Created	Average Hourly Payroll <sup>1</sup>	Annual Wages per Job	Total Annual Wages
Technicians	4	\$34.06	\$70,834	\$283,336
Administrative	1	\$21.80	\$45,334	\$45,334
Site Management	1	\$54.49	\$113,335	\$113,335
<b>Total FTE</b>	<b>6</b>	<b>N/A</b>	<b>\$229,503</b>	<b>\$442,005</b>

Source: AES, internal historic payroll estimates

Note:

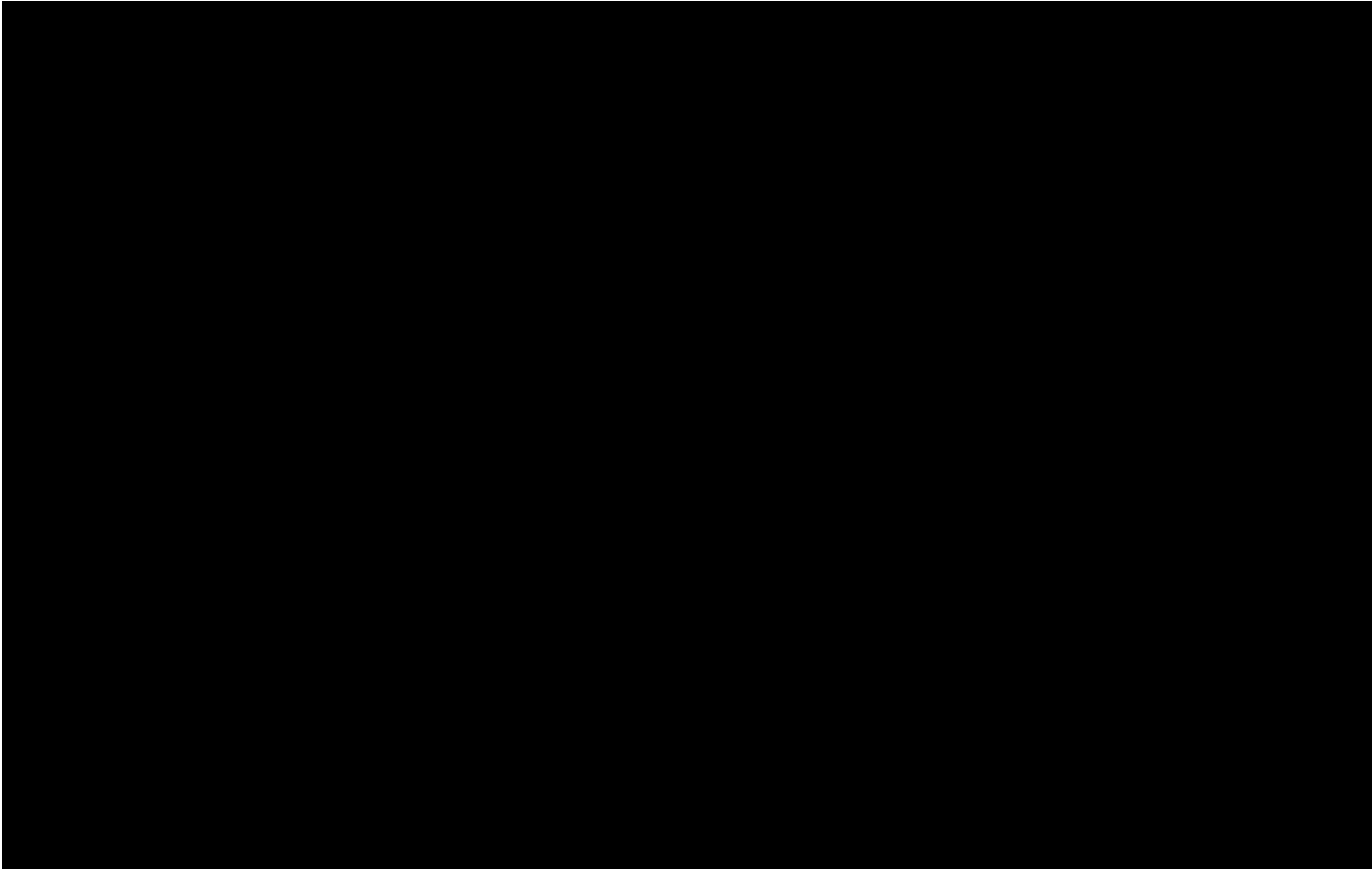
<sup>1</sup> Estimated payroll represents does not include salary compensation, such as benefits.

Key:

FTE = full-time equivalent

N/A = not applicable

**Table 18.1-5 Estimated Non-Payroll Expenditures during Operations**  
**BEGIN CONFIDENTIAL INFORMATION <**



**> END CONFIDENTIAL INFORMATION**

## **18.2 SCHOOL DISTRICTS OPERATING AND INFRASTRUCTURE COSTS (16 NYCRR § 1100-2.19(d))**

The Facility Site is located within the Letchworth Central School District, Pioneer Central School District and the Warsaw Central School District. The Letchworth Central School District and the Warsaw Central School District both experienced revenue increases from 2022 to 2023 and revenues exceeded expenditures for the school district during both years. The Letchworth School also saw a decrease in indebtedness during the same timespan, while the Warsaw Central School District saw an increase of 5 percent (Office of the New York State Comptroller 2023). Total enrollment in the Letchworth Central School District increased from 851 in 2022 to 861 in 2023. Total enrollment in the Warsaw Central School District decreased from 800 in 2022 to 769 in 2023. Expenditures in the Pioneer Central School District in 2022 exceeded revenues by approximately \$8.7 million, but this was offset by 2023 revenues that exceeded expenditures by approximately \$15.5 million. The district saw an increase in indebtedness of approximately \$1.3 million during the same timespan (Office of the New York State Comptroller 2023). Total enrollment in the Pioneer Central School District decreased from 2,158 in 2022 to 2,095 in 2023.

As discussed in Exhibit 16 Effect on Transportation, the Applicant will coordinate with the school districts during construction to ensure that any temporary increases in traffic or oversized deliveries do not affect school bus routes.

The Applicant does not expect any additional operating or infrastructure costs to be incurred by any of the school districts. The Applicant will hire local construction workers to the extent possible. Non-local construction workers will not be expected to permanently relocate to the area or be accompanied by their families. Therefore, enrollment at local schools is not expected to increase substantially as a result of construction. The Applicant will employ up to the same number of full-time employees during operations as currently employed for the Existing Facility and expects these positions will continue to be filled by local residents.

The Applicant has consulted with the superintendents of the Letchworth Central School District, the Yorkshire-Pioneer Central School District, and the Warsaw Central School District to discuss potential impacts on school district services, and consultation is ongoing (see Appendix 18-A). Although some non-local employees could have school-aged children, this number will be expected to be a small percentage of current enrollment and increases in school district services and expenditures will likely be recovered through those employees' property tax payments and the respective district's state aid. Moreover, the affected school districts will receive a considerable share of the PILOT payments. These payments will more than offset any increase in expenses incurred by the district because of Repowered Facility employees' children entering the school district. Therefore, no increases in school district costs associated with the Repowered Facility are expected.

### **18.3 MUNICIPAL OPERATING AND INFRASTRUCTURE COSTS (16 NYCRR § 1100-2.19(e))**

The Repowered Facility is not expected to result in any additional operating or infrastructure costs to the Towns of Eagle or Wethersfield, or any public authorities or utilities. Understanding the fiscal health of communities in which a project will be located provides context for assessing the potential economic impacts or benefits of that project. Revenues and expenditures in Wyoming County and the Towns of Eagle and Wethersfield increased between 2022 and 2023. 2022 expenditures in Wyoming exceeded revenues by approximately \$4 million, but this was offset by 2023 revenues that exceeded expenditures by approximately \$8 million. Expenditures in Wethersfield exceeded revenues by \$634,000 in 2022 and \$104,000 in 2023 but the town showed no indebtedness either year (Office of the New York State Comptroller 2023). Expenditures did not exceed revenues in the Town of Eagle.

As described in Exhibit 2 Overview and Public Involvement, the Applicant consulted with local municipalities and agencies at a meeting with the Town of Eagle, Town of Wethersfield, and Wyoming County on January 28, 2025, in accordance 16 New York Codes, Rules and Regulations (NYCRR) § 1100-1.3(a). During the meeting, the Applicant provided the information set forth in Section 1100-1.3(a), which included but was not limited to, a description of the proposed Repowered Facility, its environmental setting, and a map of Repowered Facility components and regulatory boundaries. Additionally, the Applicant reviewed topics of potential concern to municipalities, including traffic, visual, sound, and shadow flicker, an overview of environmental studies, and an overview of site restoration and decommissioning activities. The Applicant also hosted a public community meeting on January 28, 2025. During this consultation and public engagement, municipalities did not raise any specific concerns regarding infrastructure costs that will be incurred from the Repowered Facility aside from the desire for a road use agreement. The Repowered Facility is not located within a water or sewer district. The Repowered Facility will not consume water or generate wastewater during operations that will require municipal water or sewer services. As discussed in Exhibit 6, sanitary facilities used by construction workers will be emptied as needed and the wastes properly disposed of at a designated disposal facility.

As discussed in Exhibit 6 Public Health, Safety, and Security, construction of the Repowered Facility will generate waste from site preparation, packing materials, and construction scrap; and operations will generate minor amounts of waste related to maintenance activities. The Applicant will be responsible for collecting and transporting construction waste and paying applicable fees for disposal at the Chaffee Landfill.

With respect to police services, as described in Exhibit 6 Public Health, Safety, and Security, the Repowered Facility will not result in any new safety concerns compared to the Existing Facility. The Applicant committed to developing and implementing security measures (see the Site Security Plan in Appendix 6-B), including lighting, fencing, locked gates, signage, and other measures designed to restrict site access and deter trespassers during the construction and

operation of the Repowered Facility. The Applicant will implement a safety response plan, referred to as the Emergency Response and Communication Plan (ERCP) (see Appendix 6-C), which includes measures for responding to various emergencies, including those that could potentially involve the police. These safety measures, taken together, will avoid emergencies and minimize the need for the Repowered Facility to use municipal police services.

With respect to fire, in the unlikely event that municipal fire services are used, the annual revenues from the Repowered Facility's fire district taxes to the Bliss Fire Protection District will cover any costs. The Existing Facility is served by the Hamlet of Bliss Fire Department, within the Town of Eagle. The Applicant provided the Safety Response Plan for the Existing Facility and provided the Site Security Plan to the Hamlet of Bliss Fire Department on April 4, 2025. Based on consultations with the local emergency responders, no new or additional equipment is needed.

With respect to emergency medical response, local emergency medical services may be called upon to respond to medical emergencies common to construction and/or operational projects. In the event of any situation involving a medical, natural, or security emergency, project staff and/or subcontractors will call 9-1-1 and inform local first responders. First responders will evaluate the situation and help facilitate the correct courses of action. Given the small number of employees required to operate and maintain the Repowered Facility, the potential financial burden on the Towns of Eagle and Wethersfield to provide such services is expected to be comparatively small.

The Applicant will address impacts on roadways from the transportation of heavy equipment in accordance with pre-construction compliance filings, traffic control plans, and road use agreements that it expects to enter into with the Towns of Eagle and Wethersfield and, if requested, Wyoming County. These agreements would require the Applicant to restore any roadways impacted by the transportation of Repowered Facility components during the construction and operation of the Repowered Facility. By virtue of these agreements, the Towns of Eagle and Wethersfield would not incur any additional highway maintenance costs related to the Repowered Facility other than normal wear and tear associated with the use of non-oversized/overweight vehicles required to transport workers and equipment to and from the Facility Site for construction, operation, and maintenance purposes.

Currently three employees of the Existing Facility live in the Town of Eagle, and it is possible that new employees may elect to live in the Towns of Eagle or Wethersfield. Such increased residency would be a net benefit for the communities with negligible impacts on Town services. Moreover, if any marginal increase in services occurs, such costs are expected to be recovered through the employees' property tax payments.

**18.4 IDENTIFICATION OF JURISDICTIONS THAT LEVY REAL PROPERTY TAXES OR BENEFIT ASSESSMENTS OR USER FEES (16 NYCRR § 1100-2.19(f))**

The Repowered Facility is anticipated to result in economic benefits for the following taxing jurisdictions:

- Wyoming County
- Town of Eagle
- Town of Wethersfield
- Letchworth Central School District
- Northern Pioneer Central School District
- Warsaw Central School District
- Bliss Fire Protection District

**18.5 PAYMENTS IN LIEU OF TAXES, BENEFIT CHARGE REVENUES, AND USER CHARGE REVENUES (16 NYCRR § 1100-2.19(g))**

In exchange for a real property tax exemption, sales tax exemption, and a mortgage recording tax exemption, the Applicant expects to execute a PILOT agreement, which will require long-term annual PILOT payments to each taxing jurisdiction identified in Section 18.4, with the exception of special taxing districts, which would continue to receive separate special district tax payments from the Applicant. Taxing jurisdictions receiving various forms of payments include Wyoming County, the Town of Eagle, the Town of Wethersfield, the Letchworth Central School District, the Northern Pioneer Central School District, the Warsaw Central School District, and the Bliss Fire Protection District. Although the terms of the PILOT have not been finalized, the Applicant anticipates an estimated average annual PILOT payment rate of **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** per megawatt (MW) of installed capacity. The estimated total annual amount is approximately **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** Table 18.5-1 summarizes average annual and 30-year PILOT and tax revenue projected to be received by each taxing jurisdiction, based on the Applicant’s internal estimates.

**Table 18.5-1 Distribution of PILOT Payments**  
**BEGIN CONFIDENTIAL INFORMATION <**

**> END CONFIDENTIAL INFORMATION**

Additionally, the Applicant anticipates entering into a Host Community Agreement (HCA) with each Town. The HCA annual payment rate would total approximately **BEGIN CONFIDENTIAL INFORMATION <** [REDACTED] **> END CONFIDENTIAL INFORMATION** The estimated annual HCA amount would total **BEGIN CONFIDENTIAL INFORMATION <** [REDACTED]

**> END CONFIDENTIAL INFORMATION** Therefore, based on these estimates the HCA payments could accumulate up to a total of approximately **BEGIN CONFIDENTIAL INFORMATION <** [REDACTED] **> END CONFIDENTIAL INFORMATION** over an estimated 30-year lifespan.

In addition, the Applicant will pay special district taxes to the Bliss Fire Protection District Department. The exact amount for these payments has not been determined but the total is estimated to be approximately **BEGIN CONFIDENTIAL INFORMATION <** [REDACTED] **> END CONFIDENTIAL INFORMATION** The values presented in this section represent preliminary estimates and final agreements have not yet been executed.

## **18.6 COMPARISON OF COSTS TO JURISDICTIONS AND REVENUE GENERATED BY THE FACILITY (16 NYCRR § 1100-2.19(h))**

The Applicant is consulting with the host communities and has not identified any additional costs to local tax jurisdictions to date. The implementation of PILOT and HCA agreements (see Section 18.5) is expected to result in a net increase in local revenues.

## **18.7 LOCAL EMERGENCY RESPONSE CAPACITY (16 NYCRR § 1100-2.19(i))**

The Applicant is also committed to continuing the practices established for the Existing Facility, which will include regularly informing and training local first responders about the Repowered Facility and its components so first responders are equipped to respond in the unlikely event of an emergency. Based on consultations with the local emergency responders, no new or additional equipment was immediately identified for their need to respond to a fire, hazardous substance, or medical emergency at the Repowered Facility beyond what is needed for the Existing Facility. Exhibit 6 Public Health, Safety and Security, along with the Safety Response Plan (see Exhibit 6, Appendix 6-C Emergency Response & Communications Plan), provides specific details on the emergency equipment that the Applicant will keep on site to respond to a fire or medical emergency. The Emergency Response & Communications Plan also contains fire and emergency responder training and communication plans that will address any training deficiencies.

## **18.8 STATE SMART GROWTH PUBLIC INFRASTRUCTURE CRITERIA (16 NYCRR § 1100-2.19(j))**

The Repowered Facility is a privately funded energy project that will not result in the construction or operation of public infrastructure and will not result in unnecessary sprawl and is, therefore, not subject to ECL § 6-0107. However, this section provides a detailed statement regarding the Repowered Facility's consistency with the smart growth criteria in ECL § 6-0107.

### **Criterion 1: To advance projects for the use, maintenance, or improvement of existing infrastructure**

The purpose of the Repowered Facility is to replace and repower an economically viable wind-powered electrical-generating facility that will provide a source of renewable energy to the New York grid, and in doing so, improve the State's existing energy infrastructure without the need for construction of an all-new facility. The Repowered Facility components include up to 38 wind turbines, contributing up to 136 MW of renewable energy to the New York grid. While the Repowered Facility will use portions of existing state highway infrastructure to transport equipment, none of these activities are anticipated to have any long-term impact on existing infrastructure (see Exhibit 16 Effect on Transportation). Furthermore, the Repowered Facility is anticipated to relieve demand on the State's fuel delivery infrastructure by generating non-fuel dependent wind power and reducing the demand for fuel delivery, thereby alleviating fuel delivery constraints.

After careful consideration of its contribution to and utilization of both the New York power grid and transportation routes, the Applicant has determined that the Repowered Facility is consistent with this smart growth criterion. Consequently, the necessary changes to the public infrastructure (contribution of renewable energy to the power grid, utilization of existing transportation routes, and construction of access road intersections to existing roads) are also consistent with the criterion.

**Criterion 2: To advance projects located in municipal centers**

“Municipal centers” are defined in the Smart Growth Act as “areas of concentrated and mixed land uses that serve as centers for various activities, including, but not limited to, central business districts, main streets, downtown areas, brownfield opportunity areas, downtown areas of local waterfront revitalization program areas, transit-oriented development, environmental justice areas, and hardship areas,” as well as “areas adjacent to municipal centers, which have clearly defined borders, are designated for concentrated development in the future in a municipal or regional comprehensive plan, and exhibit strong land use, transportation, infrastructure and economic connections to a municipal center; and areas designated in a municipal or comprehensive plan, and appropriately zoned in a municipal zoning ordinance, as a future municipal center.”

Large-scale wind energy projects, such as the Repowered Facility, require extensive land; moreover, the requirement for interconnection to high-powered transmission lines restricts large-scale wind energy projects to comparatively isolated rural areas. Therefore, this criterion does not apply to the Repowered Facility.

**Criterion 3: To advance projects in developed areas or areas designated for concentrated infill development in a municipally approved comprehensive land use plan, local waterfront revitalization plan and/or brownfield opportunity area plan**

See the discussion of Criterion 2. Large-scale wind energy projects such as the Repowered Facility cannot be located within areas designated for concentrated infill development, nor are they well-suited to developed waterfront areas or most brownfield opportunity areas. Although the Facility Site is not in an area designated for concentrated infill development in a local land use plan, the Repowered Facility is consistent with the intent of this criterion to encourage development in already-developed areas. The Repowered Facility will utilize the footprint of the Existing Facility to the maximum extent practicable.

**Criterion 4: To protect, preserve and enhance the State’s resources, including agricultural land, forests, surface and groundwater, air quality, recreation and open space, scenic areas, and significant historic and archaeological resources**

The Repowered Facility will generate up to 136 MW of clean, renewable energy without emitting any conventional air pollutants or greenhouse gases (GHGs), or consuming cooling water or generating wastewater while in operation. As described in Exhibit 11 Terrestrial Ecology, the Facility Site is located within the New York State Department of Environmental Conservation (NYSDEC) Grassland Focus Area 1, which encompasses portions of Western New York. As described throughout this Application, the layout of the Repowered Facility was designed through an iterative process in which the technical and economic requirements of the Repowered Facility were weighed against impacts on land use (see Exhibit 3 Location of Facilities and Surrounding Land Use and Exhibit 11 Terrestrial Ecology), aesthetics (see Exhibit 8 Visual Impacts), cultural resources (see Exhibit 9 Cultural Resources), threatened and endangered species (see Exhibit

12 NYS Threatened and Endangered Species), surface and groundwater (see Exhibit 13 Water Resources and Aquatic Ecology), wetlands (see Exhibit 14 Wetlands), and agriculture (see Exhibit 15 Agricultural Resources). Based on the implementation of uniform standards and conditions and the inherent constraints on the Facility Site, the proposed layout avoids or minimizes environmental impacts to the greatest extent practicable while allowing the Applicant to construct a 136 MW repowered wind facility in furtherance of the State’s renewable energy goals.

Based on these analyses, the Repowered Facility has avoided and minimized impacts on these resources to the maximum extent practicable, and any remaining impacts are outweighed by the benefit provided by the Repowered Facility’s generation of up to 136 MW of clean, renewable energy, and the continued operation of an existing, large-scale renewable wind resource in New York State. Additionally, the remaining impacts will also be mitigated as outlined in other exhibits. Therefore, the Facility is consistent with this criterion.

**Criterion 5: To foster mixed land uses and compact development; downtown revitalization; brownfield redevelopment; the enhancement of beauty in public spaces; the diversity and affordability of housing in proximity to places of employment, recreation, and commercial development; and the integration of all income and age groups**

See response to Criterion 2 and 3 above. The Repowered Facility must be located in a rural area well removed from any areas that will potentially experience compact development, downtown revitalization, or significant quantities of housing (e.g., villages and cities). Therefore, this criterion is not applicable.

**Criterion 6: To provide mobility through transportation choices including improved public transportation and reduced automobile dependency**

The Repowered Facility does not directly or indirectly affect public transportation options. Therefore, this criterion is not applicable.

**Criterion 7: To coordinate between state and local government and inter-municipal and regional planning**

The Applicant conducted extensive public outreach to local government and planning agencies throughout the development and review of the Repowered Facility (see Exhibit 2 Overview and Public Involvement). This has included the public outreach conducted according to the requirements of the Article VIII permitting process. The Applicant consulted with local municipalities and agencies at a meeting with the Town of Eagle, Town of Wethersfield, and Wyoming County on January 28, 2025. The Applicant also hosted an open house meeting with community members on January 28, 2025, and engaged in numerous meetings with municipal representatives to date. To the extent applicable, these outreach efforts and municipal/agency consultations satisfy the criterion related to coordination between state and local governments. Therefore, the Repowered Facility is consistent with this criterion.

**Criterion 8: To participate in community-based planning and collaboration**

As described above, the Applicant has conducted and will continue to conduct extensive public outreach to community-based organizations throughout the development and review of the Repowered Facility. See the response to Criterion 7 for additional details. These outreach efforts satisfy the criterion related to participation in community-based planning and collaboration.

**Criterion 9: To ensure predictability in building and land use codes**

The Applicant has no role in or authority over the development or enforcement of building or land use codes in the Town of Eagle or the Town of Wethersfield. Therefore, this criterion is not applicable to the Repowered Facility.

**Criterion 10: To promote sustainability by strengthening existing and creating new communities which reduce greenhouse gas emissions and do not compromise the needs of future generations by among other means, encouraging broad-based public involvement in developing and implementing a community plan and ensuring the governance structure is adequate to sustain its implementation**

The Repowered Facility is consistent with state policies designed to encourage initiatives that reduce GHG emissions and contribute to the transition of New York’s energy markets by encouraging renewable alternatives and helping the state achieve its goal of generating 70 percent of its energy from renewable sources by 2030. The Repowered Facility promotes the reduction of GHG emissions through the use of renewable energy. Therefore, the Repowered Facility supports this smart growth criterion.

**Criterion 11: To mitigate future physical climate risk due to sea level rise, and/or storm surges and/or flooding, based on available data predicting the likelihood of future extreme weather events, including hazard risk analysis data if applicable.**

The Repowered Facility is consistent with the State’s efforts to expand reliance on renewable energy sources and reduce GHG emissions. New York State enacted the Climate Leadership and Community Protection Act to combat climate change through a modernized electric system that improves efficiency, affordability, resiliency, and sustainability. The Climate Leadership and Community Protection Act increased the State’s clean energy goal from 50% renewables to 70% renewables by 2030. Wind power is a renewable energy source that expands available power generation capabilities without increasing GHG emissions. The repowered wind power project will continue the existing displacement of GHG emission levels as wind power displaces generation from fossil fuel facilities. Therefore, the Repowered Facility will be consistent with Smart Growth Criterion 11.

**18.9 HOST COMMUNITY BENEFITS (16 NYCRR § 1100-2.19(k))**

The Repowered Facility will continue to provide positive impacts on public welfare through employment opportunities, specifically by generating temporary construction employment as

described in Section 18.1. The Applicant anticipates the following direct payments within the local community (see Section 18.5 for additional details):

- The Town of Eagle, Town of Wethersfield, Letchworth Central School District, Pioneer Central School District, Warsaw Central School District, and Wyoming County will benefit from a PILOT agreement once a PILOT is executed. The estimated total of the PILOT, over the expected 30-year term, is approximately **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** (see Section 18.5).
- Payments to the Bliss Fire District will cover special districts. The estimated total of the special district payments, over the expected 30-year term, is approximately **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** (see Section 18.5).
- During construction and installation, a total of approximately **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** of project expenditures is estimated within the host municipality for local goods and services (see Table 18.1-3).
- During operation, a total of approximately **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** of project expenditures are estimated within the host municipality annually for local goods and services (see Table 18.1-5).
- The Applicant anticipates entering into a Host Community Agreement with the Towns of Eagle and Wethersfield. The annual payment rate would total approximately **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION**

The Applicant will also participate in the New York State Public Service Commission’s Host Community Benefit Program to provide residents of the Town of Eagle and Town of Wethersfield that are electric customers of the local utility with utility bill savings. Under the Host Community Benefit Program, the Applicant will pay an annual program fee in the amount of \$1,000 per MW of capacity for the first 10 years that the Repowered Facility is in operation. The fee will be distributed equally among all residential utility customers residing in the Town of Eagle and Town of Wethersfield as a credit on their electric utility bills. Accordingly, residential utility customers will receive 10 annual bill credits beginning in the first calendar year following when the Repowered Facility becomes operational. In accordance with 16 NYCRR § 1100-10.2(j), the Applicant will provide documentation of host community benefits to be provided as a pre-construction compliance filing.

## 18.10 UNIFORM STANDARDS AND CONDITIONS

Table 18.10-1 identifies the uniform standards and conditions applicable to this exhibit.

**Table 18.10-1 Applicable Uniform Standards and Conditions for Socioeconomics**

Citation	Uniform Standards and Conditions
1100-6.1(f)	Host Community Benefits. The permittee shall provide host community benefits, such as payments in lieu of taxes (PILOTs), other payments pursuant to a host community agreement or other project(s) agreed to by the host community.
1100-6.2(a)(2)	Pre-Construction Notice Methods. At least fourteen (14) business days prior to the permittee’s commencement of construction date, the permittee shall notify the public as follows:  (2) Provide notice to local Town and County officials and emergency personnel;

## 18.11 REFERENCES

Office of the New York State Comptroller. 2023. Financial Data for Local Governments; Select Data: Level 2 – Level 1 data with extra level of detail; Select Report: Counties, Schools, and Towns; Select Year: 2010 and 2019. Accessed online at:

<http://www1.osc.state.ny.us/localgov/findata/financial-data-for-local-governments.cfm>.

Accessed on April 3, 2025.

U.S. Census Bureau. 2023. U.S. Census Profiles for Town of Eagle, Town of Wethersfield, Wyoming County, and New York State. Accessed online at: <https://data.census.gov/pro-file?q=040XX00US36>. Accessed on April 3, 2025.