
December 8, 2025

VIA ELECTRONIC MAIL

Hon. Michelle L. Phillips
Secretary
New York State Public Service Commission
3 Empire State Plaza
Albany, New York 12223-1350
secretary@dps.ny.gov

Re: Case 24-M-0433 – In the Matter of the Rules and Regulations for the Environmental Review, Permitting, and Siting in this State of Major Renewable Energy Facilities and Major Electric Transmission Facilities Under the Renewable Action Through Project Interconnection and Deployment Act.

Dear Secretary Phillips:

AES Clean Energy Development, LLC, submits these comments in response to the Office of Renewable Energy Siting and Electric Transmission's ("ORES") revised regulations for the environmental review, permitting, and siting in New York of major renewable energy facilities and major electric transmission facilities under the Renewable Action Through Project Interconnection and Deployment Act filed on October 22, 2025. AES will comment on Chapter XI, Title 16 of NYCRR Part 1100 General Procedures REVISED 2025-20-22 and Chapter XI, Title 16 of NYCRR Part 1101 Major Renewable Energy Facility Siting REVISED 2025-20-22.

AES appreciates ORES's careful consideration of stakeholder comments and key changes to the regulations including extending the permit expiration period from three to five years and positive wetlands changes. AES looks forward to our continuing engagement.

Respectfully submitted,

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