Agricola Wind

Permit Application No. 23-00064

§1100-2.19 Exhibit 18

Socioeconomic Effects

REDACTED

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EXHIBIT 18 SOCIOECONOMIC EFFECTS

On behalf of Agricola Wind LLC (the Applicant), Environmental Design & Research, Landscape Architecture, Engineering & Environmental services D.P.C (EDR) has conducted a socioeconomic analysis that quantifies the potential socioeconomic effects of the Facility based on current socioeconomic conditions of the area. The Facility is located within the Towns of Venice and Scipio in Cayuga County, New York. Information regarding population, educational attainment, and economic conditions within the host communities is summarized in Table 18-1.

Over the past 20 years, renewable energy production has increased by approximately 89% nationwide. Energy employment trends generally reflect these changes in energy production. More specifically, wind power generation employment increased by approximately 13,000 jobs nationwide between 2016 and 2019, resulting in a growth rate of approximately 13% (NASEO, 2020). Wind industry employment is predominantly found across construction (33%), professional services (25%), and manufacturing (23%) (NASEO, 2020). On a state level, electric power generation employed approximately 38,866 workers in New York State in 2021 and added 1,022 jobs over the past year. Wind electric generation accounted for approximately 4,026 New York State employees in 2021 (NASEO 2022).

The Just Transition Working Group (JTWG) 2021 Jobs Study² estimates that the onshore wind energy sector will add approximately 1,961 to 2,149 jobs in New York State by 2050. The construction industry is anticipated to add the greatest number of direct jobs, with an additional 475 to 518 jobs in New York State by 2050. Professional services, manufacturing, and other supply chain industries is anticipated to add approximately 57, 526, and 200 respectively (JTWG, 2021). Projects similar to the proposed Facility will play a key role in advancing New York State's growing green economy.

The proposed Facility is anticipated to have local, countywide, and statewide economic benefits. Utility-scale wind energy development, like other commercial development projects, can support a wide range of socioeconomic benefits to the local, countywide, and statewide economies, including job creation, purchases of local materials and services and direct revenue to local municipalities in the form of Payment in Lieu of Taxes (PILOTs) agreements and Host Community Agreements (HCAs). Additionally, income generated from direct employment during the construction and operation phases of the wind facility is used to purchase community goods and services, further expanding the local economy. This Exhibit initially examines the socioeconomic profile of host communities and subsequently presents the analysis methodology and estimation of socioeconomic effects. Effects reported in this Exhibit include direct

¹ The global COVID-19 pandemic resulted in significant job losses across the U.S. economy; however, the energy sector lost a smaller proportion of jobs compared to other sectors of the economy (e.g., tourism, hospitality and recreation, and retail). From June through December 2020, the energy industry reemployed approximately 324,000 workers nationwide but remains approximately 9% below the 2019 peak employment levels (NASEO 2020).

² The 2021 JTWG Jobs Study was required by New York State's Climate Leadership and Community Protection Act (CLCPA). The Jobs Study and supporting research were done on behalf of the JTWG as part of the New York State Climate Action Council.

employment estimates, as well as estimates of the incremental costs and benefits to the host communities resulting from the construction and operation of the Facility.

Socioeconomic Profile

Cayuga County is in New York State's Finger Lakes region. The towns hosting the Facility are in the southern portion of the county and are primarily rural communities, making up 8.02% of the population in Cayuga County. Cayuga County, along with the Town of Scipio, underwent a slight population decline from 2000 to 2022. The Town of Venice experienced a slight population increase in the same time span.

There is a significant difference in the median housing value in New York State compared to Cayuga County and the Towns of Scipio and Venice. Of the towns hosting the Facility, the Town of Scipio has the highest median housing value at \$169,700 which is less than half the median housing value of New York State at \$384,100. The median household incomes across the towns, county, and state are similar, ranging from \$63K to \$88K. The Town of Venice has the highest median household income at \$88,036. Given the county and towns have similar household incomes and significantly lower median housing values than across New York State, these data suggest the communities around the Facility Site have a low cost of living compared to New York State.

While the cost of living in the communities around the Facility Site may be low, these data suggest that these communities may have high levels of inequality. For example, while the Town of Venice has the highest median income and lowest median housing value, it also has the highest unemployment rate, a poverty rate of over 10%, and lags Cayuga County and New York State in terms of educational attainment. The jobs that are expected to be created by the Agricola Wind Project will bring economic stability to an area that has experienced population decline and fallen behind New York State in many socioeconomic metrics.

Table 18-1. Demographic Information

	Town of Scipio	Town of Venice	Cayuga County	New York State
	Popul	ation		
2022 Population	1,465	1,315	76,171	19,994,379
% Annual Change (2000-2022)	-0.2%	+0.1%	-0.3%	+0.2%
% of population ages 15-64	63.9%	68.9%	64.1%	65.9%
	Educational	Attainment		
% High school graduate or higher	86.2%	86.1%	88.5%	87.6%
% Bachelor's degree or higher	21.9%	19.1%	23.0%	38.8%
	Housing a	nd Income		
Median Housing Value	\$169,700	\$134,400	\$158,900	\$384,100
Median household income	\$74,291	\$88,036	\$63,227	\$81,386
Individuals below poverty level	7.7%	10.7%	13.5%	13.6%
Employment				

Unemployment Rate	2.3%	6.4%	4.3%	6.2%
Labor Force Participation	61.7%	69.8%	57.6%	62.9%

Source: 2018-2022 American Community Survey 5-Year Estimates, Decennial Census, Tables S0101, P001, S1501, DP04, S1701, S2503, and DP03.

In decreasing order, the top five employment sectors in New York State are Health Care and Social Assistance; Professional, Scientific, and Technical Services; Retail Trade; Accommodation and Food Services; and Real Estate, Rental, and Leasing (US Census Quarterly Workforce Indicators, 2022). The top five employment sectors within Cayuga County include Health Care and Social Assistance; Manufacturing; Retail Trade; Construction; and Accommodation and Food Services (US Census Quarterly Workforce Indicators, 2022). Cayuga County has a workforce that is well positioned to provide labor for wind projects given its high rates of employment in the manufacturing and construction sectors when compared to New York State.

Although not captured by total employment numbers, agriculture is an important employment sector in the county when considering the land area dedicated to agriculture. According to the 2022 U.S. Department of Agriculture (USDA) National Agricultural Survey, there are 747 farms in Cayuga County, and 1,342 agricultural producers countywide³ (USDA NASS, 2022). These farm operations occupy approximately 222,764 acres within Cayuga County, which accounts for 50.32% of the County's total land area (USDA Census of Agriculture, 2022).

Long-term economic conditions have been projected for various regions throughout New York State by the New York State Department of Labor (NYSDOL). From 2020 through 2030, overall employment in New York's Finger Lakes region, which includes the Facility Site, is projected to grow at 2.2%, a slightly lower rate than the 2.3% projected for New York State as a whole. This increase will be concentrated differently across industrial sectors. The five fastest-growing sectors forecasted for the Finger Lakes region are Food Preparation and Serving Related; Personal Care and Service; Healthcare Support; Transportation and Material Moving; and Installation, Maintenance, and Repair (NYSDOL, 2020). This Project will contribute to growth in the Installation, Maintenance, and Repair sector which is projected to be a significant growth sector in the Finger Lakes region.

Understanding the fiscal health of communities in which a project will be located is essential to assessing the potential economic impacts or benefits of that project. The general fiscal profile for any municipality includes its revenues, expenditures, and long-term debt obligations. Most of the revenue collected is through real property taxes, sales taxes, and state aid. Municipalities (towns, villages, and counties) and school districts, as independent taxing jurisdictions, are responsible for providing specific services and facilities to those who live and work within their boundaries and for levying the taxes needed to pay for those services and facilities. To support the assessment of potential economic impacts of the Facility, local property tax levies and tax rates for the taxing jurisdiction, in which the Facility is proposed to be located

³ The 2022 Census of Agriculture term "producer" describes those involved in making decisions for the farm.

were reviewed. The relevant taxing jurisdictions affected by the Facility are Cayuga County; the Towns of Scipio and Venice; Moravia Central School District, and Southern Cayuga Central School District.

Annual municipal expenditures are recovered in large part through each municipality's tax levy, which is borne by taxable properties. Real property taxes are determined by each property's assessed value, multiplied by the tax rate established by each taxing jurisdiction. Table 18-2 summarizes the most recent data available for municipal and county property tax levies and rates in the County and Towns.

Table 18-2. Property Tax Levy and Municipal Tax Rate

	Levy y	ear 2022 (2021/)	Levy year 2023 (2022)		
	Property Tax Levy ⁴	Tax Rate per \$1000 Full Eq. Rate Value		Property Tax Levy	Tax Rate per \$1000 Full Value	Eq. Rate
Cayuga County	\$42,957,014	7.94	87.35	\$43,586,598	7.29	81.53
Town of Scipio	\$277,049	1.79	83.00	\$283,823	1.65	76.00
Town of Venice	\$568,103	5.22	83.00	\$579,340	4.90	100.00

Source: New York State Office of Real Property Tax Services, 2022-2023

Another significant source of revenue for the County and Towns is local sales tax revenue. The current sales tax rate for Cayuga County is 8% (4% local tax plus 4% state tax) (New York State Department of Taxation and Finance, 2023). In 2023, the total sales tax revenue for the county was \$59,085,192 (New York State Comptroller, 2023).

An overview of the balance of a municipality's revenues, expenditures and indebtedness reveals its general fiscal health. As illustrated in Table 18-3, from 2021 to 2022, the revenues, expenditures, and indebtedness in the Town of Venice has increased, while in Cayuga County, only revenues and expenditures increased while indebtedness decreased. In the Town of Scipio, revenues increased slightly while expenditures decreased; the Town carried no debt in 2021 and 2022. While cutting expenditures is one avenue towards a balanced fiscal budget, it is beneficial to combine this with a strategy to increase local revenues.

⁴ Property tax levy reflects the amount of revenue required by the municipality through the property tax base and is equal to total municipal spending minus aid and other revenues. Tax base is equal to the sum of taxable parcel values. Municipal tax rate is determined by dividing the levy by the tax base, such that each taxable parcel produces that amount of property tax per \$1,000 assessed value. For a \$100,000 property in the Town of Scipio, property tax liability = (2.32 / 1000) * 100,000, or \$232. An equalization rate is the state's measurement of a municipality's level of assessment (LOA). An equalization rate of 100 means that the municipality is assessing property at 100 percent of market value. An equalization rate lower than 100 means that the municipality's total market value is greater than its assessed value.

Table 18-3. Municipal Budgets

	2021	2022
	Cayug	a County
Total Revenues & other sources	\$197,817,577	\$210,126,180
Total Expenditures & other uses	\$189,659,966	\$205,212,444
Total Indebtedness	otal Indebtedness \$49,162,576 \$	
	Town of Scipio	
Total Revenues & other sources	\$1,316,607	\$1,319,245
Total Expenditures & other uses	\$1,166,866 \$1,031,872	
Total Indebtedness	\$0 \$0	
	Town of Venice	
Total Revenues & other sources	\$1,440,614	\$2,770,133
Total Expenditures & other uses	\$1,388,341	\$2,672,350
Total Indebtedness	\$286,674 \$453,281	

Source: New York State Comptroller, 2021-2022, (x= no data available), Tables FX51, H51, FX910, and FX48.

School districts in New York are subject to a separate budgeting process. The Facility is located within two school districts: Moravia Central School District and Southern Cayuga Central School District. The budgets for all school districts are shown in Table 18-4. From 2021 to 2022, these two school districts experienced increases in revenues. Moravia Central School District decreased in expenditures and debt. Meanwhile, Southern Cayuga Central School District increased in expenditures and debt in the same span of time (New York State Comptroller, 2021-2022).

Table 18-4. School District Budget

	2021	2022	
	Moravia Central School District		
Total Revenues & other sources	\$25,708,779	\$38,024,642	
Total Expenditures & other uses	\$31,633,770	\$28,793,182	
Total Indebtedness	\$23,662,000	\$20,614,878	
	Southern Cayuga Central School District		
Total Revenues & other sources	\$18,998,886	\$20,801,118	
Total Expenditures & other uses	\$17,602,516	\$22,821,854	
Total Indebtedness	\$8,167,470	\$11,226,657	

Source: New York State Comptroller, 2021-2022, Tables W411 and AM411.

Fire districts are an additional taxing jurisdiction to school districts and municipalities. The Facility is located within the Scipio-Venice-Ledyard Fire District. In 2022, annual property tax revenues for the Scipio-Venice-Ledyard Fire District totaled \$228,050 (New York State Comptroller, 2023). Anticipated contributions from the Agricola Wind Project to this fire district are discussed in Section (g).

In the face of budget shortfalls and a statewide property tax cap, municipalities may find it advantageous to maximize other, less traditional forms of revenue. As discussed in greater detail below, wind projects provide direct benefits to local taxing jurisdictions through Payments in Lieu of Taxes (PILOTs) and Host

Community Agreements (HCAs). In addition, wind projects such as the proposed Facility generally have other local, regional, and statewide economic benefits. Wind power development, like other commercial development projects, can expand the local, regional, and statewide economies through both direct and indirect means.

(a) Construction Workforce

The socioeconomic effects of the Facility were evaluated, in part, using the Job and Economic Development Impact (JEDI) land-based wind model (Release Number: W6.28.19). The JEDI model was created by the National Renewable Energy Laboratory (NREL)—a government-owned, contractor-operated laboratory funded by the U.S. Department of Energy—to assess the economic impacts of proposed wind energy generating facilities during both the construction and operation phases (USDOE NREL, 2021). This model allows users to estimate jobs, earnings, and economic output by using facility-specific data provided by the Applicant and geographically defined multipliers. These multipliers are produced by IMPLAN Group, LLC using a software/database system called IMPLAN (IMpact analysis for PLANning), a widely used and widely accepted general input-output modeling software and data system that tracks each unique industry group in every level of the regional data (IMPLAN Group, 2020). This analysis utilized the 2021 IMPLAN multiplier data, as that was the most recent data readily available at the time of the initial analysis (August 2024). More specifically, the JEDI model was utilized in estimating the number of direct construction and operation and maintenance (O&M) jobs as well as the direct project expenditures generated as a result of the construction and operation of the Facility.

This analysis concentrates on the socioeconomic impacts from onsite labor and other project expenditures that the proposed Facility may have on the statewide economy and within the host communities. Onsite labor impacts are the direct impacts experienced by the companies/individuals residing in New York State engaged in the onsite construction and operation of the Facility. These values represent expenditure of dollars on labor (wages, salaries, and associated expenses) of onsite construction personnel, as well as O&M personnel. Furthermore, onsite labor impacts can be measured in terms of jobs (as expressed through the increase in employment demand), and the amount of money earned through those jobs (measured by the wages and salary compensation paid to employees). For the purposes of this analysis, the term "jobs" refers to the total number of year-long full-time equivalent (FTE) positions created by the Facility, assuming a 40-hour work week for 52 weeks of the year. Persons employed for less than full time or less than a full year are included in this total, each representing a fraction of an FTE position (e.g., a half-time, year-round position is 0.5 FTE).

Calculating the number of jobs and earnings estimated to be generated by a proposed facility using the JEDI model is a two-step process. The first step requires facility-specific data inputs (e.g., year of construction, size of facility, and location). These facility-specific data are used to provide a baseline set of assumptions to produce a conservative estimate of the total positive jobs and economic impacts likely to be produced by the Facility. For purposes of the JEDI model, the Applicant has assumed the following inputs:

Location: Cayuga County, New York

Year of Construction: 2026⁵

• Total Project Size (Nameplate Capacity): 99 MW

• Number of Turbines: 22⁶

Installed System Cost (\$/kW): <BEGIN CONFIDENTIAL INFORMATION>
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Operations and Maintenance Cost (\$/kW): <BEGIN CONFIDENTIAL INFORMATION>
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Money Value (Dollar Year): 2024

Using the Facility-specific data provided, as well as the IMPLAN multipliers and statewide/municipal population census data, the JEDI model creates a list of default values, which include facility cost values, default financial parameter values, default tax values, default lease payment values, and default local share of spending values. These default values are derived from research on large-scale wind facilities by NREL and stem from various sources, including interviews and surveys of leading project owners, developers, engineering and design firms, and construction firms active in the wind energy sector.

The second step of the JEDI model methodology requires the review and, if warranted, the customization of default facility cost values and financial parameter values to reflect the most accurate estimates. The Applicant reviewed the default facility cost values, statewide shares, and host community shares (subtotaled by categories in the JEDI model) to determine whether they were on par with the real costs as experienced by the Applicant's team of development and financial experts. The Applicant's team then made specific adjustments to improve the accuracy of the JEDI model (see Table 18-5).

Table 18-5. Adjustments Made to JEDI Model Cost Inputs
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Project Expenditure Categories	JEDI Default Value	Adjusted Value	Change

⁵ For the purposes of the JEDI analysis, which assumes one year for construction, the start year of construction 2026 was used. Actual construction is anticipated to be an 18-month period occurring over 2026 and 2027.

⁶ Note that although the Applicant presents a 24-turbine layout elsewhere in this Application to provide a conservation estimate of the Facility environmental impacts. This socioeconomic analysis assumed a 22-turbine layout to avoid overestimating the Facility's economic benefits.

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2019); Costs verified by the Applicant in August 2024.

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Based upon JEDI model computations, it is anticipated that construction of the proposed Facility will generate employment of an estimated 89 FTE onsite Project Development and Onsite Labor positions for New York State residents, 78 of which will be for Construction and Interconnection labor and 11 of which will be Construction-Related Services (i.e., engineering, design, and other professional services). At the county level, the Facility is estimated to generate employment of an estimated 15 FTE on-site Project Development and Onsite Labor positions for Cayuga County residents, 14 of which will be for Construction and Interconnection labor and one of which will be Construction-Related Services. These positions have been verified as reasonable by the Applicant based on job numbers at other facilities in New York State.

The Applicant's construction management team has further evaluated the anticipated employment level to provide the estimated average construction workforce, by discipline for each quarter of the 18-month construction period (see Tables 18-6 and 18-7). The Applicant estimates quarterly peaks of approximately 119 FTE statewide construction jobs and 20 FTE countywide construction jobs during the third quarter of 2026. The quarterly labor averages were developed by estimating the monthly job values based on the seasonal fluctuations experienced in New York State and averaging the months together by quarter. For the purposes of this analysis, the summer and fall months of June, July, August, and September were assumed to be the peak construction season and the winter months of January, February, and March were assumed to be the off-peak construction season. The results are summarized in Tables 18-6 and 18-7.

Table 18-6. Estimated Quarterly Statewide Labor Averages by Discipline

	Quarterly Period						
Labor Discipline	Q1 '26 (Jan-Mar)	Q2 '26 (Apr-Jun)	Q3 '26 (Jul-Sep)	Q4 '26 (Oct-Dec)	Q1 '27 (Jan-Mar)	Q2 '27 (Apr-Jun)	
Construction & Installation Lab	,	(14. 20)	(* a.: 5 cp)	(000 200)	(Fair Trial)	(
Laborers	6.0	12.0	23.9	12.0	6.0	12.0	
Electricians	5.7	11.4	22.9	11.4	5.7	11.4	
Equipment Operator	4.7	9.4	18.7	9.4	4.7	9.4	
Construction Managers	0.8	1.6	3.1	1.6	0.8	1.6	
Ironworkers	6.5	13.0	26.0	13.0	6.5	13.0	
Millwrights	0.5	1.0	2.1	1.0	0.5	1.0	
Foreman	1.8	3.6	7.3	3.6	1.8	3.6	
Construction-Related Services							
Engineering, Design, & Professional Services	3.7	7.3	14.7	7.3	3.7	7.3	
Total Labor Average	29.7	59.3	118.7	59.3	29.7	59.3	

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2021), Quarterly Averages verified by the Applicant in September 2024. These estimates are subject to change based on site specific conditions and workforce availability.

Table 18-7. Estimated Quarterly Countywide Labor Averages by Discipline

	Quarterly Period						
Labor Discipline	Q1 '26	Q2 '26	Q3 '26 (Jul-	Q4 '26	Q1 '27	Q2 '27	
	(Jan-Mar)	(Apr-Jun)	Sep)	(Oct-Dec)	(Jan-Mar)	(Apr-Jun)	
Construction & Installation Lab	or						
Laborers	1.1	2.1	4.3	2.1	1.1	2.1	
Electricians	1.0	2.1	4.1	2.1	1.0	2.1	
Equipment Operator	0.8	1.7	3.4	1.7	0.8	1.7	
Construction Managers	0.1	0.3	0.6	0.3	0.1	0.3	
Ironworkers	1.2	2.3	4.7	2.3	1.2	2.3	
Millwrights	0.1	0.2	0.4	0.2	0.1	0.2	
Foreman	0.3	0.7	1.3	0.7	0.3	0.7	
Construction-Related Services							
Engineering, Design, &							
Professional Services	0.3	0.7	1.3	0.7	0.3	0.7	
Total Labor Average	5.0	10.0	20.0	10.0	5.0	10.0	

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2021), Quarterly Averages verified by the Applicant in November 2024. These estimates are subject to change based on site specific conditions and workforce availability.

(b) Payroll and Non-Payroll Expenditures during Construction

The JEDI model estimates a total of \$22.9 million for annual earnings of the 89 onsite construction jobs for New York State residents, \$3.8 million of which is the estimated annual earnings of the 15 on-site construction jobs for Cayuga County residents. Estimated earnings represent total wages and salary compensation paid to New York State employees (i.e., wages plus average annual overhead costs including social security insurance [SSI], Medicare, workers' compensation, and disability). Project Development and Onsite Labor earnings are realized by New York State residents and Cayuga County residents who are engaged in the construction of the Facility, including the Construction and Interconnection, Engineering, Design, and Professional Services trades. These estimates of the annual construction earnings by trade were estimated by the JEDI model based on facility-specific data provided by the Applicant and geographically defined multipliers (see Section (a) for additional information on methodology) and are listed in Table 18-8.

Table 18-8. Annual Earnings by Trade During Project Development and Construction (in \$ Millions)

Trade	Statewide Earnings	Countywide Earnings
Construction & Interconnection	\$21.2	\$3.8
Engineering, Design, & Professional Services	\$1.7	\$0.1
Total	\$22.9	\$3.9

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2019)

Notes: Earnings values are millions of dollars in year 2022 dollars. Earnings are independently rounded, and therefore may not add up directly to the integers shown in this table.

Local, regional, and statewide employment during the construction phase will primarily benefit those in the construction trades (e.g., laborers, electricians, equipment operators, etc.). The Applicant expects the

majority of these construction jobs will be filled by residents of the local labor market. However, Facility construction will also require workers with specialized skills, such as crane operators, turbine assemblers, specialized excavators, and high voltage electrical workers. The Applicant will hire residents within the local labor market to fill the highly specialized positions to the extent practicable. Any highly specialized workers hired from outside the local labor market are anticipated to remain in the region only for the duration of construction.

Estimated non-payroll project expenditures to be made during the construction period both within New York State and Cayuga County are listed in Table 18-9. To the extent practical, portions of the county expenditures will be spent within host municipalities.

Table 18-9. Estimate of Annual Direct Non-Payroll Expenditures during Construction

BEGIN CONFIDENTIAL INFORMATION Statewide Project State County County **Construction Cost Item Expenditures Expenditures** Share Share **Expenditures**

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2019); Expenditures verified by the Applicant in September 2024.

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(c) Workforce, Payroll, and Expenditures During Facility Operation

The operation and maintenance of the proposed Facility is estimated to generate three full-time jobs for New York State residents with combined estimated annual earnings of approximately \$0.2 million. Cayuga County residents are anticipated to hold onsite operational jobs, unless no qualified technicians are available. These positions have been verified as reasonable by the Applicant based on job numbers at other facilities in New York State, and are anticipated to be comprised of technicians, project management and administrative personnel. Table 18-10 provides an overview of annual wages of each full-time job position. These three full-time local jobs comprise the Facility's onsite long-term employment impact.

Table 18-10. Hourly and Annual Wages of Onsite Labor during Operational Years

Positions	Number of Positions	Hourly Wage per Job	Annual Wages per Job
Technicians	2	\$35.50	\$73,840
Administrative	1	\$22.72	\$47,258
Site Management	1	\$56.80	\$118,144

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2019)

Note: Wages and number of positions are independently rounded, and therefore may not equate directly to the totals shown. Hourly and annual wages of onsite labor during operation is the average base wage only and therefore does not include employer payroll costs (e.g., SSI, Medicare, workers' compensation, and disability).

Estimated annual non-payroll expenditures to be made within New York State and Cayuga County during the O&M period are shown in detail in Table 18-11. These expenditures would total approximately \$2.7 million statewide annually, \$2.6 million of which is anticipated to be spent at the county level annually. This includes materials and services purchased for the operation and maintenance of the Facility, sales tax, payments to local landowners, and payments to tax jurisdictions, i.e., PILOT agreement payments (see Section (g) below). To the extent practical, portions of the county expenditures will be spent within host municipalities.

Operation Cost Item

Project Cost
State Statewide Expenditures
Share
Share
Statewide Expenditures
Share
Shar

Table 18-11. Estimate of Annual Direct Non-Payroll Expenditures during Operation and Maintenance

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2019); Expenditures verified by the Applicant in September 2024

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Additionally, payments to local landowners within the Towns of Venice and Scipio will be made in association with lease, easement, and purchase agreements executed to host Facility components, and Good Neighbor Agreements (GNAs) executed with certain adjacent properties. Lease and easement payments will offer direct benefits during construction and installation totaling an estimated **BEGIN CONFIDENTIAL INFORMATION** to participating landowners. During the Facility's operating life, lease and easement payments will offer direct benefits totaling an estimated **BEGIN CONFIDENTIAL INFORMATION** END CONFIDENTIAL INFORMATION END CONFIDENTIAL END CONFIDENTIAL INFORMATION END CONFIDENTIAL END CONFIDENTIAL END CONFIDENTIAL END CONFIDENTIAL EN

(d) Incremental School District Operating and Infrastructure Costs

The Facility is not expected to result in any additional operating or infrastructure costs to the local school districts. Although it is possible that some of the long-term Facility operation employees may have school-

aged children, increases in school district services and expenditures would likely be recovered through those employees' property tax payments and the respective district's state aid. Moreover, as discussed in Section (g), the affected school districts will also benefit from PILOT agreements. These payments will more than offset any possible increase in expenses incurred by the districts because of Facility employee children entering the school districts. Prior to this analysis, the Applicant engaged in several consultation efforts with the Southern Cayuga Central School District and the Moravia Central School District. Specifically, the Applicant contacted each Superintendent of Schools and Transportation Supervisor via a letter dated July 18, 2024, providing a map of the Facility in relation to each school district boundary, and requesting information regarding established school bus routes and hours of operation to inform the Applicant's transportation effects analysis and ensure that future construction and operation-related activities avoid, minimize, and mitigate any potential school transportation concerns. The Applicant received feedback from the Moravia Central School District on August 1, 2024. Additionally, the Applicant emailed each Superintendent of Schools on October 16, 2024 to provide further details about the Facility and request feedback on potential impacts or issues each school district might like to discuss as it relates to the Facility. The Applicant has not received a response at the time of this Application filing (see Appendix 2-A and 2-B). The Applicant has also conducted numerous public outreach activities to inform the public and local officials about the Facility. For more details on outreach activities, please see Exhibit 2 (Overview and Public Involvement).

(e) Incremental Municipal, Public Authority, or Utility Operating and Infrastructure Costs

The Facility is not expected to result in any additional operating or infrastructure costs to the local municipalities, authorities, or utilities. The Facility will place limited (if any) demand on municipal services; however, this demand will be recovered through fees and payments. For example, if long-term Facility operation employees live in the Towns of Scipio and Venice, their required services will be paid for through property taxes and utility fees. The Facility will not require municipal water, sewer, or solid waste disposal services.

As part of Exhibit 6 (Public Health, Safety and Security), the Applicant has committed to developing and implementing a Safety Response Plan and Site Security Plan (See Appendices 6-A and 6-B). These plans address the site security features to be implemented at the Facility, and measures for responding to various emergencies, including those that could potentially involve police and other emergency response personnel. These measures, taken together, will limit the need for the Facility to utilize municipal police, fire, and emergency response services. Given the small number of employees required to operate and maintain the Facility, the potential financial burden on the towns to provide such services is expected to be comparatively small. Additionally, as discussed in Section (g), the Facility is expected to contribute annual revenue to the Scipio-Venice-Ledyard Fire District which will be available to cover any costs associated with municipal emergency response. The Safety Response Plan (Appendix 6-A) and the Site Security Plan (Appendix 6-B) were provided to the Scipio and Venice local emergency responders on March 13, 2024. In addition, on April 23, 2024, the Applicant led an in-person meeting with the local emergency responders to review the plans in a group setting and gathered several new insights to fold into the plans. Emergency responders who could not attend the meeting were emailed on May 14, 2024 with a summary of what was discussed during the in-person meeting and a request for any additional feedback on the draft plans.

Although transportation of major Facility components during construction will impact certain roadways, the Applicant will work with the Towns and County to address and mitigate these impacts through Road Use Agreements (RUAs), which would require the Applicant to restore roadways impacted by the transportation of Facility components during construction and operation of the Facility. By virtue of these agreements, the towns in which the Facility is located will not incur any additional highway maintenance costs related to the Facility other than normal wear and tear associated with the use of vehicles required to transport workers and equipment to and from the Facility Site for operation and maintenance purposes. The Applicant provided print and digital copies of the draft RUA to the Towns of Venice and Scipio in February and March 2024 and requested each Town's review and feedback. The Applicant also initiated outreach related to transportation and RUA development with the Cayuga County Highway Committee and Counsel beginning on May 29, 2024, when the Applicant provided a Project introduction and a figure depicting the preliminary delivery route for Facility construction via email. The Applicant met with County Highway Committee representatives virtually on June 11, 2024 and provided digital copies of the draft RUA on June 17, 2024, requesting comments and feedback. The draft RUA continues to be under review by the County and Town representatives who are coordinating as one group. For additional information, please see Exhibit 16 (Effects on Transportation). The Applicant will continue to consult with the County and Town Highway Superintendents, Town Supervisors, and Counsel representatives regarding the Facility's potential transportation effects and the RUA.

Prior to this analysis, the Applicant consulted with the affected municipalities, public authorities, and utilities. The Applicant has also conducted numerous public outreach activities to inform the public and local officials about the Facility. For more details on outreach activities, please see Exhibit 2 (Overview and Public Involvement).

(f) Jurisdictions that Will Collect Taxes or Benefits

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

- Cayuga County
- Town of Scipio
- Town of Venice
- Southern Cayuga Central School District
- Moravia Central School District⁷
- Scipio-Venice-Ledyard Fire District

(g) Incremental Amount of Annual Taxes or Payments

The Applicant will be initiating the negotiation of a PILOT agreement with the Cayuga County Industrial Development Agency on behalf of the local taxing jurisdictions in exchange for a real property tax exemption. Additionally, the Applicant will be initiating negotiations of HCA agreements with the Towns of Scipio and Venice to provide additional direct annual payments. Although the terms of the PILOT agreement

⁷ No installed capacity is located within the Moravia Central School District. A short section of collection line is the only Facility component located within this jurisdiction. Direct economic benefits are anticipated to be minimal.

have not been finalized, the Applicant anticipates a 20-year agreement and an estimated annual payment
rate of BEGIN CONFIDENTIAL INFORMATION END CONFIDENTIAL INFORMATION per MW.
The estimated annual PILOT amount would total BEGIN CONFIDENTIAL INFORMATION END
CONFIDENTIAL INFORMATION per year, escalating at rate of approximately BEGIN CONFIDENTIAL
INFORMATION END CONFIDENTIAL INFORMATION annually. Therefore, the PILOT payments
would accumulate up to a total of approximately BEGIN CONFIDENTIAL INFORMATION
END CONFIDENTIAL INFORMATION (in 2024 dollars) over 20 years. At the time of this analysis, the
Applicant anticipates the HCA annual payment rate would total approximately BEGIN CONFIDENTIAL
INFORMATION END CONFIDENTIAL INFORMATION per MW. The estimated annual HCA
amount would total BEGIN CONFIDENTIAL INFORMATION END CONFIDENTIAL
INFORMATION per year, escalating at rate of approximately BEGIN CONFIDENTIAL INFORMATION
END CONFIDENTIAL INFORMATION annually. The HCA payments would accumulate up to an
estimated total of BEGIN CONFIDENTIAL INFORMATION END CONFIDENTIAL
INFORMATION (in 2024 dollars) over the 20 years. The Applicant also estimates the Scipio-Venice-Ledyard
Fire District will be paid roughly BEGIN CONFIDENTIAL INFORMATION END CONFIDENTIAL
INFORMATION annually to cover the Fire District Tax.

Table 18-12 summarizes the estimated PILOT payments projected to be made to each taxing jurisdiction. Payment amounts shown are based on the Project's projected capacity of up to 99 MW. Payment amounts would increase or decrease in direct proportion to changes in the Project's final installed capacity. These estimates are based on 2024 tax rates and estimated annual installed capacity within each taxing jurisdiction. Specific allocation of funds will be determined upon execution of the final terms of the PILOT Agreement.

No installed capacity is located within the Moravia Central School District. A short section of collection line is the only Facility component located within this jurisdiction. Therefore, it is not anticipated that the Moravia Central School District will receive PILOT payments.

Table 18-12. Estimated Annual and Total PILOT Amounts

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Taxing Jurisdictions Receiving PILOTs	Estimated Annual Installed Capacity (<u>MW</u>)	Payment per MW (\$/MW)	Annual PILOT Estimate for Year 1	20-Year PILOT Estimate

END CONFIDENTIAL INFORMATION

(h) Comparison of Incremental Costs and Incremental Benefits

As discussed above, the Facility is not expected to result in any incremental costs to local tax jurisdictions but will instead result in significant benefits through implementation of a PILOT Agreement consistent with Title 16 New York Codes, Rules and Regulations (16 NYCRR) Section 1100-6.1(f).

(i) Equipment or Training Deficiencies in Local Emergency Response Capacity

A description of all contingency plans to be implemented in a response to the occurrence of a safety or security emergency is provided in Exhibit 6 (Public Health, Safety and Security). The local emergency responders are not expected to have specialized equipment or training to respond to a fire, hazardous substance, or medical emergency beyond the typical first aid, medical emergency and fire vehicles, and equipment that would be at a local fire department. Therefore, local emergency responders are expected to be able to fulfill the contingency plans. Exhibit 6, along with the Safety Response Plan, provides specific details on all onsite equipment and systems the Applicant will provide to prevent or handle fire emergencies and hazardous substance incidents, as well as the training drills that will be conducted with emergency responders and onsite personnel. Because local emergency responders are not expected to provide any emergency services beyond those ordinarily provided, no equipment or training deficiencies are anticipated. As described in Section e, the Safety Response Plan (Appendix 6-A) and the Site Security Plan (Appendix 6-B) were provided to the Scipio, and Venice local emergency responders on March 13, 2024 and an in-person meeting with local emergency responders to review the plans was held on April 23, 2024. During the meeting and within email outreach, emergency responder representatives described the challenge of being under-resourced, specifically with respect to ageing equipment, not having many full-time staff, as well as a lack of specialized training in certain areas. Representatives want to ensure their organizations are prepared to respond to facility-specific incidents, and that Liberty is also prepared with their own internal resources, personnel, and expertise, especially where local response is not practical or advised. In response, the Applicant has committed to developing a more comprehensive plan for operations staff and emergency preparedness as an anticipated construction date approaches. This will include certification requirements for full-time operations staff, emergency response training expectations, and a more detailed emergency response plan that will be specific to each fire district for what their response roles will be in the event of certain types of emergencies.

(j) Consistency with State Smart Growth Public Infrastructure Criteria

The New York State Smart Growth Public Infrastructure Policy Act is meant to maximize the social, economic, and environmental benefits from public infrastructure development by minimizing the impacts associated with unnecessary sprawl. State infrastructure agencies, such as the New York State Department of Transportation (NYSDOT), shall not approve, undertake, or finance a public infrastructure project, unless, to the extent practicable, the Project is consistent with the smart growth criteria set forth in ECL § 6-0107.

Although the Facility will not result in the construction or operation of public infrastructure and will not result in unnecessary sprawl, approvals from the NYSDOT may be required due to facility components traveling on and crossing state highways. Therefore, this section provides a detailed statement regarding the Facility's consistency with smart growth criteria. As discussed below, the Facility is consistent with six of the eleven criteria, while the remaining five criteria do not apply to the Facility.

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

The purpose of the Facility is to create an economically viable wind-powered electrical-generating facility that will provide a source of renewable energy to the New York State grid, and in doing so, improve the State's existing energy infrastructure. As defined throughout this Application, the Facility collectively refers to up to 24 wind turbines, collection lines, access roads, temporary construction laydown yards and a concrete batch plant, a collection substation, a point of interconnect (POI) switchyard, an operations and maintenance facility, permanent aircraft detection lighting system (ADLS) and meteorological (MET) towers, and a short 115kV overhead transmission line that will connect the Facility to the high voltage electrical grid. While these Facility components are not public infrastructure and are generally not expected to result in the operation of public infrastructure, the Facility will contribute up to 99 MW of renewable energy to the New York State grid. Additionally, the Facility will use portions of existing State highway infrastructure to transport equipment. However, none of these activities are anticipated to have any long-term impact on existing infrastructure. The Agricola Wind Project is consistent with this smart growth criterion, when its contribution to and utilization of both the New York State power grid and transportation routes identified above are considered. The necessary changes to the public infrastructure (contribution of renewable energy to 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 Facility, require extensive land; moreover, the requirement for setbacks from residences and other structures restricts utility-scale wind energy projects to areas with lower population density. Therefore, this criterion does not apply to the 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 discussion of Criterion 2 above. Utility-scale wind energy projects such as the Facility cannot be located within areas designated for concentrated infill development nor are they well-suited to developed waterfront areas and/or brownfield opportunity areas. Therefore, this criterion does not apply to the Facility.

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 Facility will generate up to 99 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. In general, the Facility Site includes lands suitable for the construction of a wind facility and does not include unique environmental resources, Critical Environmental Areas, or unusual land uses relative to other locations in the surrounding region. As described throughout this Application, the layout of the Facility was designed through an iterative process where the technical and economic requirements of the Facility were weighed against impacts to land use (see Exhibits 3 [Location of Facilities and Surrounding Land Use] and 15 [Agricultural Resources]), aesthetics (see Exhibit 8 [Visual Impacts]), cultural resources (see Exhibit 9 [Cultural Resources]), environmental/ecological resources (such as forests, wetlands, and sensitive wildlife habitat) (see Exhibits 11 [Terrestrial Ecology] and 14 [Wetlands]), surface and groundwater (see Exhibit 13 [Water Resources and Aquatic Ecology]), and public safety (see Exhibit 6 [Public Health, Safety and Security]). Within the constraints of the permitting process and the inherent constraints on the Facility Site, the proposed Facility layout avoids or minimizes environmental impacts to the greatest extent practicable while allowing the Applicant to construct an up to 99 MW wind facility in furtherance of the state's renewable energy goals. This Application summarizes and includes analyses of the potential environmental impacts and benefits of the Facility, including analyses specifically associated with agricultural land, agricultural viability, forests, surface and groundwater, air quality, recreation and open space, scenic areas, and significant historic and archaeological resources. In addition, a Visual Impact Assessment (VIA; see Appendix 08-A) has been prepared which assesses potential visual impacts within a 5-mile study area in accordance with 16 NYCRR 1100-2.9. Furthermore, the Article VIII regulations require a consideration of significant state and national resources beyond 5 miles and therefore, the Visual Study Area (VSA) was extended to 10 miles. Based on these analyses, the Applicant believes that the Facility has avoided and minimized impacts to these resources to the maximum extent practicable (based on the layout as currently proposed), and that any remaining impacts are outweighed by the benefit provided by the Facility's generation of up to 99 MW of clean, renewable energy. 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 above. The Facility must necessarily be located in a rural area well removed from any areas that would potentially experience compact development, downtown revitalization, or significant quantities of housing, etc. (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 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 has conducted extensive public outreach to local government and planning agencies throughout the development and review of the Facility (see Exhibit 2). This has included the public outreach conducted in accordance with the requirements of the Article VIII process. The Applicant also has reached out individually to each of the local governments that will be directly affected by the Facility. Moreover, the Article VIII process specifically requires outreach and coordination between the Applicant and state agencies with a role in reviewing the Application for the proposed Facility. To the extent applicable, these outreach efforts and municipal/agency consultations satisfy the criterion related to coordination between state and local governments. Therefore, the Facility is consistent with this criterion.

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

The Applicant team has conducted and will continue to conduct extensive public outreach to community-based organizations throughout the development and review of the Facility. See response to Criterion 7 for additional detail. 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 Towns of Scipio and Venice. Therefore, this criterion does not apply to this 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 Facility is consistent with state policies designed to encourage initiatives that reduce greenhouse gas emissions and contribute to the transition of New York's energy markets by encouraging renewable alternatives, such as the Climate Leadership and Community Protection Act (CLCPA). The Facility

promotes the reduction of greenhouse gas emissions using renewable energy. The Facility, therefore, supports this smart growth criterion. See Exhibit 17 for a more detailed discussion of the Facility's consistency with energy planning objectives.

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 Facility is consistent with New York State's efforts to expand reliance on renewable energy sources and reduce greenhouse gas emissions. In doing so, this Facility contributes to efforts to mitigate overall future risks of climate change, such as sea level rise, storm surges, and/or flooding. Furthermore, according to the New York State Department of State (NYSDOS) Geographic Information Gateway, the Facility is not located in mapped hazard risk areas related to physical climate risks, including risks associated with the Lake Ontario, Hudson River, and Atlantic Ocean (NYSDOS 2021). Therefore, the Project is expected to have a positive impact on the mitigation of future physical climate risk, thereby supporting Smart Growth Criterion 11.

Smart Growth Attestation

The Smart Growth Act requires that the chief executive officer of a state infrastructure agency (or his or her designee) attest in writing that the project under review, to the extent practicable, meets the relevant smart growth criteria in ECL § 6-0107(2). As previously noted, the Facility will not result in the construction or operation of public infrastructure as that term is used in the Smart Growth Act. As a result, the requirement to obtain an attestation from the chief executive officer of a state infrastructure agency does not apply to the Facility.

(k) Host Community Benefits

The socioeconomic analysis presented in this Exhibit suggests that the construction and operation of the Agricola Wind Project will have a positive impact within the host communities. The Facility will provide direct financial benefits to the host communities, significantly increasing local revenues without requiring new public infrastructure. Direct payments will occur within the host communities in the form of PILOT payments, HCA payments, land leases, and easements, as well as purchases of local goods and the provision of employment and spending of wages. The following is a list of direct payments anticipated to be spent within local communities (for additional details see Section (q)):

- During operation, lease and easement payments will offer direct benefits totaling an estimated **BEGIN CONFIDENTIAL INFORMATION END CONFIDENTIAL INFORMATION** to participating landowners annually over the lifespan of the Facility (see Section (c)).
- The host municipalities, school districts, and Cayuga County are expected to benefit from the PILOT agreement once executed. The estimated total of the PILOT, over the expected 20-year term, is **BEGIN CONFIDENTIAL INFORMATION** (in 2024 dollars) (see Section (g)).

- The Applicant also expects to execute an HCA with the host municipality. The estimated total of the HCA payments, over the 20-year term, is **BEGIN CONFIDENTIAL INFORMATION END CONFIDENTIAL INFORMATION** (in 2024 dollars) (see Section (g)).
- At the time of this analysis, the Applicant anticipates that roughly **<BEGIN CONFIDENTIAL**INFORMATION> **<END CONFIDENTIAL INFORMATION>** will be paid annually to the Scipio-Venice-Ledyard Fire District to cover the Fire District Tax.
- During construction and installation, a total of **BEGIN CONFIDENTIAL INFORMATION END CONFIDENTIAL INFORMATION** of project expenditures is estimated to be spent locally within Cayuga County for local goods and services (see Table 18-9). During Operation & Maintenance, an annual total of **BEGIN CONFIDENTIAL INFORMATION END CONFIDENTIAL INFORMATION** of project expenditures is estimated to be spent locally within Cayuga County for local goods and services (see Table 18-11).
- The Applicant will participate in the Host Community Benefit Program and therefore will provide \$1,000/MW annually for the first 10 years of the Project to be distributed equally amongst all residential utility customers residing in the host communities.

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.

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