



**Date:** January 28, 2025

**Subject:** Summary of Comments - NYPA Renewables Draft Strategic Plan Public Hearings

**INTRODUCTION**

On October 8, 2024, the Power Authority published the draft NYPA Renewables Strategic Plan (“Draft Plan”), which includes 40 projects in every region of New York State for a total potential capacity of over 3.5 gigawatts (“GW”) of renewable generation and energy storage capacity.<sup>1</sup> The Draft Plan describes how the Power Authority will operationalize our new renewables work under NYPA’s expanded authority in the 2023-24 Enacted State Budget.

Written comments on the Draft Plan may be submitted for a 60-day period, with a deadline of December 9, 2024. NYPA held 12 public hearings in geographically diverse regions of the State, as detailed below. This memorandum summarizes comments received in all 12 hearings based upon transcripts and staff notes, and summarizes all written comments received through December 9, 2024. This memo will serve as the basis for a summary of comments to be contained in the final Strategic Plan presented to the Trustees for approval in January.

<b>Strategic Plan Hearing Schedule</b>		
<b>Western New York Hearing</b>	<b>Niagara Power Vista</b> 5777 Lewiston Road Lewiston, NY 14092	<b>Thursday, Nov. 7, 2024</b> 10 a.m. to noon and 6 to 8 p.m.
<b>Southern Tier Hearing</b>	<b>Holiday Inn Downtown</b> 2-8 Hawley St. Binghamton, NY 13901	<b>Thursday, Nov. 14, 2024</b> 10 a.m. to noon and 6 to 8 p.m.
<b>Capital Region Hearing</b>	<b>Albany Capital Center</b> 55 Eagle St. Albany, NY 12207	<b>Monday, Nov. 18, 2024</b> 10 a.m. to noon and 6 to 8 p.m.
<b>New York City Hearing</b>	<b>John Jay College</b> 524 West 59th St. New York, NY 10019	<b>Wednesday, Nov. 20, 2024</b> 10 a.m. to noon and 6 to 8 p.m.
<b>Virtual Hearing</b>	<b>Zoom</b>	<b>Thursday, Nov. 21, 2024</b> 10 a.m. to noon and 6 to 8 p.m.
<b>Long Island Hearing</b>	<b>Suffolk County Community College – Grant Campus</b> 1001 Crooked Hill Road Brentwood, NY 11717	<b>Monday, Nov. 25, 2024</b> 1 to 3 p.m. and 6 to 8 p.m.

<sup>1</sup> NYPA Renewables Strategic Plan Public Comment Draft, published October 8, 2024, available at: <https://www.nypa.gov/-/media/nypa/documents/document-library/renewables/NYPA-Renewables-Draft-Strategic-Plan>.

## **COMMENT SUMMARY**

Stakeholder feedback is summarized below, with each participating stakeholder being placed into an interest category, such as “Education and Training Stakeholders” or “Labor Stakeholders.” Commenters are identified by name when their views are attributable to a single organization or leader. Commenters speaking on their personal views are referred to as “Individuals.” Where possible, similar stakeholder feedback from multiple entities is harmonized into themes.

NYPA received comments from over 170 individuals through 12 public hearings held throughout the State on the Draft Plan and over 5,500 written submissions submitted via email. Of those written submissions, over 5,300 were collected and submitted by the Public Power Coalition of New York, following a uniform set of recommendations, which are summarized below under “Environmental and Energy Advocates.”

### **Community Organizations and Environmental Justice Advocates**

Numerous community organizations representing local and disadvantaged community interests and environmental justice interests commented on the Draft Plan, including PUSH Buffalo, South Bronx Unite, New York City Environmental Justice Alliance, PEAK Coalition, the Variety Boys and Girls Club of Queens, the Community Foundation for Greater Buffalo, the Network for Sustainable Tomorrow, Feedmore Western New York, NY Renews, the Lipsey Architecture Center Buffalo, the Buffalo Olmstead Parks Conservancy, Explore & More - Ralph C. Wilson, Jr. Children’s Museum, Old Astoria Neighborhood Association, Cold Spring Climate, Buffalo Scholastic Rowing Association, Clean Air Coalition of Western New York, Stop Energy Sprawl, Solar One, and Urban Upbound, as well as businesses and NYPA customers, for example Ozkar Services and Tecmotiv.

A representative from the Astoria Houses, a New York City Housing Authority development, noted how NYPA has played a key role in their community, which has sometimes been referred to as “Asthma Alley,” a moniker that the residents are hoping to eliminate in the near future. Specifically, this representative noted how NYPA’s environmental justice efforts in their community have served to enhance environmental literacy and awareness, and to empower the community to take action. They noted that the Draft Plan, and the 3.5 GW of renewable energy and storage capacity included therein, are a good start.

South Bronx United stated that the South Bronx is the epicenter of environmental justice inequity, with many illnesses caused by waste transfer stations, last-mile warehouses, petrochemical industries, and fossil fuel power plants that operate regularly, not just during the peak load window. They argued that the 3.5 GW worth of projects included in the Draft Plan was a profound betrayal that places lives of the South Bronx community at risk. They stated that environmental justice is not a distant ideal, but an existing need.

A representative from the New York City Environmental Justice Alliance and PEAK Coalition commented that the 3.5 GW of capacity proposed in the Draft Plan is not enough and NYPA should build 15 GW, as well as include offshore wind and more energy storage in the Draft Plan. They expressed particular opposition to the lack of proposed projects in New York City (Zone J). They stated that disadvantaged communities in New York City have borne the brunt of pollution from NYPA’s peaker plants for years, and those communities should be prioritized for clean energy, green jobs, and a resilient grid. They also noted that electric utility bills in New York City are currently unaffordable and should be addressed in the Draft Plan. Finally, they requested that NYPA share specifics around its project selection process and use its authority to enhance capacity or build partnerships with front-line, community co-owned projects.

The CEO of the Variety Boys and Girls Club of Queens commented that his organization serves many children impacted by climate change and poor air quality conditions. He advocated that society needs to do more to provide these children with relief, including the build out of more offshore wind and the successful completion of Tier 4 projects. He noted how his organization has successfully partnered with NYPA on the Sky Farm Long Island City project to deliver a rooftop community garden where youth can learn about sustainable food production and environmental science. He underscored the importance of efforts such as Sky Farm, as well as

P-TECH and Young Engineers, as effective ways to serve the youth and foster the creation of “green-collar” jobs.

PUSH Buffalo stressed the need for representation from low-income and energy insecure residents, and requested that NYPA provide more information on its plan to partner with communities and support community-led project development, including information on how NYPA will ensure the projects contained in the Draft Plan are built by a diverse workforce and create long-lasting job opportunities. They also emphasized the importance of ensuring that a minimum of 35-40% of direct investment in these renewable projects go to disadvantaged communities. The group requested that NYPA increase the number of projects in the Draft Plan from 3.5 GW to 15 GW of renewable energy and storage capacity, and requested additional focus on developing plans and goals for community solar. Finally, PUSH Buffalo requested additional information on the process NYPA used to pre-qualify developers and investors. The Community Foundation for Greater Buffalo expressed appreciation that the Draft Plan demonstrated that NYPA will use revenue from the new renewable and storage projects to support communities.

The Network for Sustainable Tomorrow also recommended that NYPA increase the capacity of projects contained in the Draft Plan from 3.5 GW to 15 GW. They stressed the need for a plan for peaker retirement and encouraged NYPA to pursue projects in the Southern Tier. They expressed interest in forming partnerships with NYPA at the community level, including around better utilizing schools and launching workforce development activities. NY Renews and Cold Spring Climate both expressed support for the Draft Plan’s labor and disadvantaged community provisions, but also advocated for NYPA to build 15 GW of renewable energy and storage capacity, rather than the 3.5 GW proposed, to reach New York’s climate goals and improve community health. Stop Energy Sprawl cautioned NYPA against using eminent domain in building any of the proposed projects.

FeedMore Western New York expressed appreciation for the components of the Draft Plan that promote job creation and benefit economically disadvantaged New Yorkers, such as the Renewable Energy Access and Community Help (“REACH”) program and workforce development initiatives, and NYPA’s other community support through its environmental justice program and the Western New York Power Proceeds Allocation Board. Urban Upbound commended NYPA for including wraparound support services in its workforce development plans and urged NYPA to take this a step further by including funding for stipends in its workforce development programs. Udalls Cove Preservation Committee expressed support for the Draft Plan, including NYPA’s Propel NY project, and encouraged NYPA take the most ambitious outlook possible.

The Old Astoria Neighborhood Association noted the history of power plants and related health issues in their neighborhood; given that, they expressed support for any action that eliminates the use of fossil fuels at those facilities to improve environmental health. Additionally, they questioned what NYPA is doing to prevent communities from blocking renewable generation facilities.

Neighborhood Housing Services of Queens noted that even with existing incentives, residents still struggle to afford their utility bills and upgrade their appliances to more efficient, lower carbon options. They noted that these same residents bear the brunt of climate impacts. Given this perspective, they support NYPA’s efforts to ensure an equitable clean energy transition, particularly through the REACH program. They urged NYPA to work directly with community organizations to identify additional low-income community members who live outside of DACs that are not currently eligible for REACH. Finally, they encouraged NYPA to propose projects beyond the 3.5 GW included in the Draft Plan and expedite the timeline for project completion.

The Clean Air Coalition of Western New York noted a few areas where they felt the Draft Plan came up short, including proposing only 3.5 GW of projects, not explicitly targeting vacant or underutilized industrial brownfields, and not providing enough information on the proposed projects. To address these issues, they requested that NYPA (1) set a goal to develop 15 GW of new renewables by 2030, (2) work with area labor unions to develop at least one industrial-scale thermal energy network in NYISO Zone A, (3) prioritize vacant

industrial brownfield properties in project siting, and (4) strengthen grid resiliency by developing more decentralized energy generation projects and investing in transmission infrastructure.

The Long Island Progressive Coalition recommended that NYPA increase the capacity of projects contained in the Draft Plan from 3.5 GW to 15 GW. In addition, they recommended that the strategic plan include more projects on Long Island, noting that while Long Island constitutes 15% of the State's population, only 5% of the projects proposed in the Draft Plan, consisting of two energy storage projects, would be sited on Long Island. They also recommended that NYPA expand the REACH program to encompass the Long Island Power Authority's ("LIPA") service territory, noting that there are over 90,000 low- to moderate-income households on Long Island that could benefit from electric utility bill credits. In addition, they recommended that NYPA work with LIPA to build renewable energy projects on Long Island, utilizing the Long Island Solar Roadmap, which identifies low-impact sites for commercial and utility-scale solar development. Finally, they recommended that NYPA explore siting opportunities for renewables and thermal energy networks on public land, such as land held by educational institutions, colleges, and universities.

Solar One urged NYPA to build 15 GW of renewable energy by 2030. They also recommended that the Draft Plan include a full viability assessment of the total potential capacity on all public land and other sites. While Solar One supported NYPA's workforce development investments, they urged NYPA to also mandate employer commitments that result in job placements and to institute transparent tracking and metrics.

Other local organizations and businesses, including Tecmotiv, Ozkar Services, the Lipsey Architecture Center Buffalo, the Buffalo Olmstead Parks Conservancy, Explore & More - the Ralph C. Wilson, Jr. Children's Museum, and the Buffalo Scholastic Rowing Association expressed gratitude to NYPA for previous support and partnerships, and expressed openness to partnering with NYPA for other public-private partnerships in the future. Ozkar Services noted how NYPA's focus on supplier diversity has helped them grow as small business, and urged that focus to continue in the implementation of the Draft Plan.

Sustainable Westchester provided comments clarifying its position as summarized in the 2024 Conferral Report pertaining to how NYPA might utilize its expanded authority to supply Community Choice Aggregators ("CCAs") with renewable energy credits. Specifically, Sustainable Westchester recommended that NYPA serve as a fiscal agent on behalf of their CCA, Westchester Power, whereby NYPA would contract with project developers for long-term REC offtake, which could then be supplied to CCAs via short-term deals where NYPA would hold the long-term purchase risk. This would help CCA's overcome existing regulations, which Sustainable Westchester stated limit the duration of their REC purchase agreements to two-year terms.

Stop Energy Sprawl recommended that the State tap into NYPA's expertise in developing dispatchable emission free resources. Regarding the projects included in the Draft Plan, they argued that the projects put forward are not reliable or affordable, and that NYPA has not conducted meaningful community engagement in communities where the projects will be located. They stated that NYPA should take land use into consideration and minimize damage to natural resources, as well as account for the need for transmission to ensure deliverability of renewable generation and the handling of waste from facilities at the end of their useful life. To better inform community engagement, they requested NYPA properly identify projects so communities can determine where they are located. Overall, they stated that NYPA should pause development of the Draft Plan to perform additional due diligence on the proposed projects and to conduct an in-depth feasibility analysis to determine the best approach to achieving a carbon-free grid.

### **Consumer Interests**

Numerous organizations representing the interests of New York businesses commented on the Draft Plan, including Power for Economic Prosperity ("PEP"), an association of manufacturing companies that rely on low-cost Niagara Project hydropower to maintain their operations in the Buffalo/Niagara region of Western New York. NYPA also heard from local chambers of commerce, including the Bronx Chamber of Commerce, the Buffalo Niagara Partnership, the Niagara USA Chamber of Commerce, the Westchester County Association,

the Business Council of Westchester, the Downtown White Plains Business Improvement District, and Multiple Intervenors.

PEP noted the positive economic impacts of their member companies, but noted the economic uncertainty these businesses face from increasing cost burdens and regulatory uncertainty. They supported NYPA pursuing and building renewables only to the extent that it does not interfere with NYPA's existing economic development role. To balance these dual roles, they supported efforts to shield NYPA from adverse financial consequences, such as creating a wholly-owned subsidiary, and requested careful consideration of the cost and feasibility of each proposed project moving forward.

Buffalo Niagara Partnership had strong concerns with the underlying legislation and felt it would be a better use of state resources to address the challenges private developers are facing (e.g., supply chain, local opposition, etc.). They encouraged NYPA to forgo decommissioning natural gas plants until enough renewable energy is online to replace the load served by those plants. In line with this effort, they recommended that NYPA continue to coordinate with the NYISO on power system reliability. Further, while they appreciated NYPA's focus on transmission, they also recommended additional state investment to connect private renewable developers to the grid. They also recommended that NYPA use some of the surplus revenue from the renewable generation projects to provide cost relief to employers as the State transitions to renewable energy, and encouraged continued collaboration with the private sector.

The Bronx Chamber of Commerce advocated for the clean energy transition to be done responsibly and involve sites in the Bronx. They recognized NYPA's leadership in this space, noting how the Propel NY project will relieve transmission congestion issues in the Bronx, and how the \$25 million in annual workforce training funding will be a game changer for Bronx residents. The Downtown White Plains Business Improvement District praised NYPA's community engagement and voiced support for NYPA's ability to execute the Draft Plan.

Niagara USA Chamber of Commerce expressed conditional support for the Draft Plan. They support advancing renewables in a way that aligns with the region's economic development goals and pointed to the workforce development and community investment portions of the Draft Plans as areas to praise. They also expressed reservations about other parts of the Draft Plan, including mandated compliance with goals of the Climate Leadership and Community Protection Act ("CLCPA") and reliability concerns around the need to phase out natural gas power plants; however, they remain committed to collaborating with NYPA on the Draft Plan.

The Westchester County Association noted that they are particularly supportive of NYPA investments in large-scale transmission projects and battery storage, as well as smaller distributed generation projects. They also expressed support for REACH and NYPA's workforce development efforts, encouraging investment in workforce development in Westchester, specifically. Finally, they urged NYPA to develop robust strategies to mitigate and minimize delays in completing renewable generation projects. The Business Council of Westchester noted that they will continue to raise questions about the implementation timeline and cost of the CLCPA, but are simultaneously taking a proactive role in achieving the CLCPA goals. This role includes creating the Westchester Clean Energy Action Coalition to drive renewable energy development and electrification efforts. They noted that New York is fortunate to have the leadership of NYPA, and that while they support the Draft Plan, they also encourage increased transparency and continued partnership as NYPA moves into implementation.

Multiple Intervenors stated that the positive impact of low-cost NYPA hydropower on New York's economy is immense. They further stated that upward pressure on energy prices and regulatory uncertainty are already impacting future capital investments in New York businesses, which could ultimately lead to jobs moving to other states. Multiple Intervenors relayed that it is not opposed to NYPA building renewable energy but stressed that such efforts should not interfere with NYPA's economic development role. They also support efforts to shield existing NYPA customers from any adverse financial consequences.

The CEO of Richner Communications stated that it has participated in NYPA's ReCharge NY program as a power customer for the past 10 years, which has provided the company with stable and affordable energy rates that help them succeed as a business employing over 100 individuals. The CEO complimented NYPA's expertise and assistance in this engagement. He stated that he has confidence that NYPA will be able to address future challenges, such as those in the Draft Plan, and will build upon the success NYPA has experienced with programs like ReCharge NY.

A representative for Amcor Flexibles North America, formerly known as Bemis, a New York business and NYPA power customer, commented on their successful relationship working with NYPA to date. They noted how NYPA has helped their company better predict their energy costs, as well as working toward the achievement of their organizational greenhouse gas emissions goals through low-cost hydropower. They noted that they are looking forward to NYPA building more renewables to further these goals.

### **Education and Training Stakeholders**

NYPA heard comments on the Draft Plan from numerous education and training stakeholders, ranging from workforce training organizations to community colleges and universities, including the City University of New York ("CUNY") representatives and staff, LaGuardia Community College, Niagara University, State University of New York ("SUNY") Cobleskill, SUNY Albany, SUNY Binghamton, SUNY Farmingdale, SUNY Niagara, SUNY Stony Brook, and Clarkson University. Students and student organizations, such as Fridays for Future, also commented on the Draft Plan.

Niagara University noted the opportunity for shared initiatives between their campus and NYPA, including a pipeline of education programs in the Niagara area, from elementary school to post graduation opportunities, to train for jobs at NYPA or other local industries. Overall, they stressed the importance of ensuring Section 2.2 of the Draft Plan, entitled "Additional Components of our Expanded Authority," can be utilized for the Niagara region specifically. SUNY Cobleskill expressed excitement about the direction NYPA is going in, and encouraged NYPA and others to pursue agrivoltaics. SUNY Binghamton hopes NYPA's renewable projects provide more options to meet their obligations under Executive Order No. 22. SUNY Niagara highlighted NYPA's expertise in renewables, noting an existing partnership with NYPA to develop a 6 MW solar project on their campus that will lower their carbon footprint and help them save money on electricity. LaGuardia Community College emphasized the need for workforce training and education, applauding NYPA's commitment to \$25 million annually for such efforts. They highlighted the Clean Energy Academy, an initiative that has trained over 100 New York City Housing Authority residents, many of whom have been hired full time and promoted into jobs in the clean energy workforce.

SUNY Stony Brook commended NYPA for its commitment to fund workforce training initiatives up to \$25 million annually, noted its prior success in partnering with NYPA for such efforts, and expressed its willingness and desire to continue such efforts into the future. SUNY Farmingdale noted how NYPA has helped them advance their own renewable energy initiatives through the provision of advisory support services, and they commended NYPA on the Draft Plan. LaGuardia urged NYPA to do more to develop and hire from such programs in the implementation of projects in the Draft Plan.

Clarkson University expressed support for the Draft Plan and a willingness to support NYPA in meeting its objectives. They also noted that the REACH program will be more effective if it is fully coordinated with other efforts in place in New York for low-income households to minimize administrative burdens. While they noted support for the workforce development initiatives included in the Draft Plan, Clarkson also recommended broader education efforts to enhance community-based understanding of energy usage and efficiency and the impact those efforts can have on both affordability and the environment. They recommended that REACH be paired with this type of education. Clarkson University also recommended other additions to the Draft Plan, including integrating drone technologies and an expanded focus on transmission.

Numerous CUNY staff, including many members of the CUNY Professional Staff Congress, advocated for the Draft Plan to include 15 GW of renewable energy capacity. Some noted recent changes within the federal

government, and how that might impair the ability of the United States to make a speedy transition to renewable energy. Many CUNY staff urged NYPA to take a bold leadership position in this context. Some CUNY staff noted that the Draft Plan only includes one project in New York City and does not include efforts to decarbonize the CUNY system, which should include energy efficiency measures and the deployment of geothermal networks. Some stated that the inefficiency of the CUNY system results in adverse health impacts to students through ineffective heating and cooling and the presence of mold in some facilities. Others noted that the roofs of some CUNY buildings lack integrity, and advocated that they be rebuilt to incorporate rooftop solar arrays. Staff from SUNY Albany echoed the recommendations of others to increase the capacity of projects proposed in the Draft Plan to 15 GW.

The Director of the P-TECH Leadership Council, Diallo Shabazz, spoke of the intersection of clean energy and education, and the importance of aligning industry needs with school curricula. He also stated that the clean energy transition was imperative, especially as a means to reduce asthma and adverse health effects in disadvantaged communities. He also stressed the need to increase environmental literacy in disadvantaged communities. A student from the P-TECH program commented on their positive experience and how the program has fostered their interest in clean energy engineering, including the development of floating solar arrays.

The RETI Center noted that it is looking to partner with NYPA on workforce training initiatives in New York City. They noted that they are inspired by the opportunity for new jobs contained in the Draft Plan and would like to see a requirement that a certain percentage of all new hires for projects undertaken by NYPA be sourced from approved workforce training programs. The New York City Employment and Training Coalition also expressed an interest in partnering with NYPA. They commended NYPA on integrating workforce development into its renewable energy strategy and noted the different ways their organization could partner with NYPA to support those efforts, including existing connections with local employers, metrics tracking outcomes and investments, and wraparound support services.

The Bronx Tech Hub stressed the importance of including workforce training efforts in the Draft Plan and noted that NYPA has been an important partner in their efforts thus far, participating as the largest employer in their recent Bronx Tech Jobs Fair held at Fordham University. George Nunez, founder and CEO of Bronx Tech Hub, noted that while he wants NYPA to do more, he is grateful for the work NYPA has done.

Students and student organizations also commented on the Draft Plan, many speaking to the urgency of the climate crisis, noting recent droughts that have caused water shortages and wildfires resulting in harmful air pollution and carbon emissions. They discussed rising global temperatures and sea-levels that have intensified storms and hurricanes, such as the recent Hurricane Milton, which resulted in flooding, destruction, loss of life, and water quality impairment. Many students spoke about their uncertainty of a livable future, and their desire to see the Draft Plan include 15 GW of renewable generation, noting that additional State funding should be made available to achieve this goal, if necessary. Several students stated that the avoided costs of mitigating the impacts of climate change, and the attendant economic benefits of the clean energy transition, should also be considered in any financial calculus and should weigh heavier than the upfront cost of such investments. One representative of Fridays for Future urged NYPA to run and not walk towards achievement of the goals of the CLCPA. Another student noted that the goals of the International Panel on Climate Change are unlikely to be attained, and that with U.S. oil production at an all-time high, this is not New York's burden alone, but the challenges present New York with an opportunity to lead. Several students opined that there should be more hearings in New York City to solicit additional public comments on the Draft Plan. One student stated that the CLCPA goals cannot be merely aspirational if we are to have a livable future.

### **Elected Officials**

On November 20, 2024, NYPA received a letter co-signed by 40 members of the State Assembly and State Senate advocating that NYPA build 15 GW of renewable energy and storage capacity by 2030 to ensure that the State meets the CLCPA's goal of 70% renewable energy by 2030. The letter also argues that the Draft Plan does not (1) contain enough projects in the Hudson Valley and downstate New York, (2) provide a

pathway to phasing out peaker plants, (3) provide enough detail on plans to implement distributed energy resources, or (4) provide sufficient detail on the siting and costs of projects, which prevents informed feedback from communities, labor organizations, and elected officials. The letter asserts that NYPA is in a better position to overcome challenges faced by private developers, such as inflation and supply chain shortages, and with access to low-cost financing, is in a better position to take on projects that do not meet the revenue requirements of private developers. In addition, the letter suggests that NYPA would not request additional funding after executing contracts with the State like private developers unsuccessfully did in 2023, which, when coupled with the REACH program, would lessen the cost of the clean energy transition for New York ratepayers. Other assemblymembers provided individual comments, as summarized below.

Assemblymember Angelo Morinello praised the work that NYPA has done to date in preparation for building new renewables, and expressed support for the partnership approach, which will allow NYPA to maximize use of its resources. Assemblymember Morinello expressed appreciation for NYPA's workforce development investments and the REACH program, and hopes the disadvantaged communities of the Niagara Falls region can benefit. However, he also urged caution, noting that while renewable energy is important to New York's future, the goals are aggressive, and the costs and impacts of new renewable generation should be considered.

Assemblymember John McDonald stated that NYPA is a proven leader, and he is excited to move forward with new renewable generation in New York State. However, he noted the recent election is a concern and encouraged all stakeholders to keep pushing forward in a collaborative effort.

Assemblymember Sarahana Shrestha pushed NYPA to pursue 15 GW of renewable energy and storage capacity in the Draft Plan, and pressed NYPA to include more projects in the Hudson Valley. She identified two brownfield projects in Ulster County that are stuck due to high interconnection costs as the types of projects NYPA should be pursuing. She also pressed NYPA to develop enough renewable energy projects so that it can also supply community choice aggregation projects and increase affordable renewable power options for New York residents.

Assemblymember Pat Fahy stated that she is looking forward to working with NYPA to achieve the CLCPA goals and wants NYPA to feel empowered to build new renewable generation. She also referenced NYPA's work on the Empire State Plaza facilities, noting that \$100 million has already been allocated to decarbonize those facilities. Assemblymember Fahy further stated that achieving the distributed solar goal is a sign that we can achieve the targets that were set with hard work. She further stressed the importance of balancing competing interests, for example, agricultural preservation and renewable siting, and affordability and expeditious achievement of the CLCPA goals.

Assemblymember Robert Carroll stated that he was a key legislative proponent of NYPA's expanded authority, and that the intent of the law was that NYPA would take a leading role in the State's clean energy transition; however, the Draft Plan will not result in the State meeting the CLCPA goal of 70% renewable energy by 2030. As such, he advocated that the Draft Plan include 5 GW worth of projects to be built by 2026, and 15 GW worth of projects to be built by 2030. He noted recent setbacks for the offshore wind industry, and the importance of the REACH program, decommissioning of peaker plants, and workforce training. Finally, he stated that if NYPA needs additional resources, the State should provide those resources.

Assemblymember Scott Gray emphasized the importance of exploring innovative solutions to meeting New York's goals, including advanced nuclear technologies such as light-water reactors ("LWR") and non-LWR small modular reactors. In addition to NYPA's new renewables, Assemblymember Gray stated that it was critical to protect and continue to invest in NYPA's existing hydroelectric assets. He further encouraged NYPA to continue partnerships with State and local stakeholders, as well as at the federal level, to ensure that the projects proposed in the Draft Plan are fiscally viable.

Assemblymember Khaleel Anderson expressed that their main concern was making sure that all renewable projects have a Local Businesses and Entrepreneurship (LBE) component for contracting opportunities. Assemblymember Anderson also noted the importance of making sure that apprenticeship programs reach



hard-to-employ or economically displaced individuals. They also argued that NYPA should build at least 15 GW of renewable energy capacity by 2030.

Assemblymember Chuck Levine recognized NYPA's leadership in publishing the Draft Plan, and in its work to generate reliable electricity, from Niagara to Massena to Long Island. Assemblymember Levine encouraged NYPA to prioritize more renewable energy projects in Downstate New York, including Long Island, and to phase out peaker plant operations. In addition, Assemblymember Levine commended NYPA on its commitment to funding workforce training that is imperative to effectuating a just transition. Finally, Assemblymember Levine noted NYPA's origins and the foresight of then-Governor Franklin D. Roosevelt, noting that the State is once again in a position where it must look forward with optimism to the future of energy.

Assemblymember Philip A. Palmesano expressed concerns with NYPA's Draft Plan and the underlying expanded authority related to cost, reliability, local input, environmental impacts, and land-use requirements. Assemblymember Palmesano noted concerns that NYPA's efforts would undercut private markets and should therefore be avoided. He said that instead NYPA should focus on developing dispatchable emissions free resources, such as nuclear energy. Assemblymember Palmesano stated that NYPA must protect its ratepayers from the costs associated with the Draft Plan, and noted fear that NYPA would disregard local input, desires, and concerns.

Joanne Cunningham, Chair of the Albany County Legislature, viewed NYPA's decision to hold 12 hearings favorably, noting that NYPA was only required to hold three such hearings. She further noted other positive attributes of the Draft Plan, including its attention to workforce development, the commitment to clean energy that will reduce the State's dependence on fossil fuels for electric generation, engaging labor, and robust community engagement.

Manna Jo Green, an Ulster County legislator, recommended easing interconnection roadblocks for distributed solar through improvements to distribution feeders to which large numbers of projects interconnect or to those feeders identified by local governments as having the greatest potential for solar projects. They further recommended the creation of a clean energy development mapping tool and increased attention on ensuring benefits to disadvantaged communities.

Ginger Schroeder, a Cattaraugus County legislator, argued that instead of building renewables, NYPA should focus on what it has historically done – nuclear, hydropower, and infrastructure. The legislator also voiced specific opposition to the Alle-Catt Wind Project.

Albany Mayor Kathy Sheehan stated that NYPA has a crucial role to play in the clean energy transition, and she is proud that one of the projects in the Draft Plan is in the City of Albany. She views workforce development as critical in the clean energy transition and expressed support for NYPA's \$25 million annual investment in workforce training and planned use of project labor agreements. She pointed to partnerships between the City of Albany, Capital Region BOCES, Hudson Valley Community College and others as the type of workforce investments that should continue. Mayor Sheehan also stressed the importance of affordability as projects are selected going forward.

Nate Hotchkiss from the Binghamton City Council indicated that NYPA will have to do more than the 3.5 GW of projects included in the Draft Plan to achieve the CLCPA goals and encouraged NYPA to try and get as close to 15 GW as possible. He offered NYPA his support in trying to move the Draft Plan forward.

Michael Zagrobelny, the Mayor of Waddington, expressed gratitude for NYPA's relationship with the community over the last six decades, and noted support for the careful consideration that went into selecting the initial group of projects in the Draft Plan. The Mayor further expressed support for the Draft Plan's emphasis on community benefits and support for union labor, noting the positive impacts NYPA has had on the community. The Mayor encouraged NYPA to promote the use of low-cost electricity for residential customers and commercial entities within the project boundaries.

Jen Metzger, Ulster County Executive, raised concerns about the potential loss of productive agricultural land, specifically due to a 30 MW solar farm included in the Draft Plan that they believe is planned for agricultural properties owned by the New York State Department of Corrections and Community Supervision and associated with the Eastern Correctional Facility in the Town of Wawarsing. To address this potential issue, they recommended that any solar initiative progressed by NYPA should utilize the Smart Solar Siting Scorecard, which was developed by NYSERDA's Agricultural Technical Working Group and designed to balance agriculture with renewable energy goals while informing decision making and stakeholder engagement. Additionally, they stated that while the Draft Plan stated that this project would benefit a disadvantaged community, the project just happens to be located in a mapped disadvantaged community, and that the project interconnects with the transmission system and will not directly serve the community it is in or replace polluting infrastructure. As such, they recommended reviewing all such designations in the Draft Plan to ensure that projects classified as benefiting disadvantaged communities will actually do so. Finally, they proposed two sites for 10 MW worth of distributed renewable generation projects that could directly serve disadvantaged community households, including a capped landfill site located on the border between the Town of Wawarsing, the Village of Ellenville and the Paradise Lane property in New Paltz, and offered to help NYPA identify another 20 MW worth of project sites in the future.

### **Environmental and Energy Policy Advocates**

Environmental and Energy Policy Advocates had a wide variety of views on the Draft Plan. Over 5,300 written comments were collected and submitted by the Public Power Coalition of New York, summarized as follows:

- Increase the total planned capacity from 3.5 GW to at least 15 GW;
- Provide more detail on the proposed projects, including where they are sited and how much they will cost, so that more meaningful public feedback can be provided;
- Include details and timelines for NYPA's plans to partner with communities to develop distributed energy resources;
- Include a detailed plan for phaseout of NYPA's peaker plants;
- Plan at least 5 GW for the Hudson Valley and downstate New York, with more attention to distributed energy resources;
- Fully decarbonize public schools by siting utility-scale and distributed generation on SUNY and CUNY campuses and building enough capacity to meet their energy demands;
- Ensure that enough capacity is built to create and sustain a pipeline of green union jobs for New Yorkers;
- Redirect economic development funds from large corporations and towards renewable energy development; and
- Add public hearings in Central New York, the North Country, and the four other boroughs of New York City.

Numerous commenters advocated for the Draft Plan to include projects allowing NYPA to build at least 15 GW of new renewable energy and storage capacity by 2030, rather than the 3.5 GW contained in the Draft Plan. These views were espoused by representatives and members of the Public Power Coalition of New York, the Green Education and Legal Fund, 350 NYC, New Yorkers for Clean Power, and the Alliance for a Green Economy. In addition to an increase to 15 GW of capacity, these commenters presented an organized set of recommendations to revise the Draft Plan to include the full decarbonization of public buildings such as New York State public schools, colleges, and universities, increased involvement in offshore wind, increased adoption of geothermal, a detailed plan for the phaseout of peaker plants, and the creation of a sustainable pipeline of "green collar" jobs. Driving these recommendations were observations of the impacts of the climate crisis, including rising global air and water temperatures, and increased instances of flooding, drought, and wildfires. With these impacts in mind, coupled with recent setbacks in achieving the CLCPA goal of 70% renewable energy by 2030, these commenters uniformly called for increased urgency on the part of NYPA to build more renewables faster than anticipated in the Draft Plan. New Yorkers for Clean Power also advocated for additional projects to be built in the Southern Tier and requested that economic development funding be redirected from large corporations to renewable energy development, but expressed support for NYPA's

workforce development and training investments, REACH program, environmental justice commitments, inclusion and community solar in disadvantaged communities, and commitment to decarbonizing the Small Natural Gas Power Plants. The Public Power Coalition of New York stated that NYPA is in a strong financial position and should use this advantage to make ambitious capital investments necessary to achieve New York's clean energy future, rather than using credit preservation as a rationale for a more conservative approach.

While many advocates argued that the Draft Plan should include more renewable energy projects, other Environmental and Energy Policy Advocates, such as NY Energy and Climate Advocates, and Nuclear New York, advocated that the Draft Plan's reliance on renewable energy systems will result in a continued reliance on fossil fuels while making electricity more expensive and less reliable. Further, they opined that NYPA should focus instead on developing new nuclear energy systems and enhancing existing hydropower facilities to decarbonize the electric grid. By comparison, the Alliance for a Green Economy noted they are opposed to NYPA building new nuclear energy due to high costs and health and safety concerns. NY Energy and Climate Advocates also raised concerns that expanding into renewables would weaken NYPA's ability to perform its existing obligations. They recommended that NYPA revise the Draft Plan to include a comprehensive evaluation of system-level needs, identifying the effective combination of technologies to achieve zero-emission electricity.

SANE Energy Project noted that they were appalled by the climate crisis and commented that the Draft Plan is a good first step, but more needs to be done to act with purpose, and the solution is public ownership of renewables. They noted that capitalism has not provided a solution to the climate crisis, and has created a need to act with urgency to build public renewables and create healthy, green jobs immediately.

A representative from Rewiring America noted how their organization is focused on decarbonizing buildings through electrification, which underscores the importance of the Draft Plan to decarbonize the electric grid as the foundation upon which such efforts rely.

The New York League of Conservation Voters noted that New York is not currently on track to meet its CLCPA goals and NYPA can play an important role in addressing this shortfall. They expressed support for NYPA's diverse project mix, use of project labor agreements and apprenticeship requirements, and NYPA's approach to include more mature projects in the Draft Plan's initial tranche, which will make them easier to deliver. They further supported NYPA's inclusion of \$12.6 million to develop the clean energy workforce, while stating their desire to see NYPA allocate the full \$25 million per year allowed by legislation for future programs. Overall, they viewed the Draft Plan as a strong first step, and encouraged NYPA to focus on grid reliability, transmission projects, reducing emissions in environmental justice communities, and large-scale decarbonization of public properties in future plans.

The Center for Public Enterprise commended NYPA on the Draft Plan, including NYPA's strategy for developing an initial renewable energy portfolio, and noted that they have shared NYPA's approach with other states. They further noted that they would like to hear from NYPA on what barriers need to be addressed to expand beyond the 3.5 GW worth of proposed projects, raising transmission, financing, and interconnection as potential barriers to address.

Several clean air advocacy organizations, including Clean Air and the American Lung Association commented on the importance of renewables in reducing the usage of fossil fuels to generate electricity and therefore reducing air pollutants, which may result in adverse health impacts, such as asthma.

Citizens Campaign for the Environment commended NYPA for moving forward with the Draft Plan, specifically noting support for NYPA's plan to develop battery energy storage systems at the Brentwood site. They requested a specific schedule for the closure of peaker plants. They also requested additional renewable energy projects proposed to be located in Nassau and Suffolk Counties.

Protect our Coast - Long Island New York voiced support for renewable energy in general, but it opposes offshore wind due to environmental impacts and high-cost, raising energy affordability as a key concern.

New York Energy Alliance expressed that NYPA seems to be doing its best to implement its renewable mandate while also acknowledging practical limitations; however, they argued that neither side seems to appreciate this approach. With the differing opinions, they argued that NYPA needs to be judicious with its projects and funds and provide for positive community impacts as much as possible. They also recommended that NYPA build projects where they have expertise, including nuclear, hydro and transmission.

Renewable Energy Long Island commended NYPA on the Draft Plan, noting that plan does a good job of setting forth a strategy to decrease carbon emissions and bring new renewable energy sources online, all while ensuring a just transition and benefits for local communities. They encouraged NYPA to consider more projects in Downstate regions like Long Island, especially if sited on underutilized brownfields and rooftops. They also voice support for the REACH program, and offered to partner with NYPA to help advance additional projects on Long Island.

The Coalition for Community Solar Access (“CCSA”) stated that NYPA’s efforts to develop new renewables should be complementary to, and not competitive with, ongoing efforts by other state agencies and the private sector. CCSA urges NYPA to focus on the large-scale renewables market, and to stay out of the small-scale (projects 5 MW or less) community solar marketplace. CCSA noted that while achieving the 70% Renewable Energy Goal of the CLCPA is in jeopardy, the 6 GW Distributed Solar Goal has been achieved, and as such, NYPA should focus on large-scale project development as well as continue its focus on transmission. Finally, CCSA argued that the REACH program should only utilize resources above 5 MW and should not access any budget-limited sources of funding available to the private sector.

While the Sierra Club supported NYPA’s plan to fill in gaps in statewide renewable development, they recommended that NYPA expand the ambition and focus of its renewable generation efforts by accelerating the retirement of NYPA’s existing fossil fuel-fired generation fleet and evaluating support for additional groups of at-risk projects, including reaching out to developers of projects that recently rejected their 2023 class year cost allocations. They also recommended continued advancement of clean energy transmission projects and supported elimination of NYPA’s statutory obligation to maintain a majority ownership stake in clean energy projects it develops.

The Association for Energy Affordability (“AEA”) strongly supported the mission of NYPA to build new renewable energy generation in New York but argued that 3.5 GW is insufficient to address the projected 15 GW needed to meet the CLCPA’s 70% renewable energy goal. They expressed concern that NYPA’s upcoming peaker phase-out plan will not be attainable without significant expansion of the proposed volume of renewable energy projects contained in the Draft Plan. AEA notes that there are great opportunities for NYPA to build large amounts of distributed solar in New York City, leveraging municipal and institutional support. AEA notes that the Draft Plan indicates NYPA’s intention to do so, but does not include any plans or processes to this end. Finally, AEA notes that 15% of New Yorkers are considered to be “energy burdened” and are paying over 6% of their income on utility costs. To address this issue, AEA supports the establishment of the REACH program.

Scenic Hudson stated that the Draft Plan identifies just a few projects in the Hudson Valley region and encouraged NYPA to continue to seek development opportunities there. In addition to benefiting from job opportunities, economic development, and pollution reduction that accompanies new renewables, Scenic Hudson notes that Hudson Valley’s low-income residents stand to benefit greatly from the REACH program, as the cost of electricity continues to rise in the region. Scenic Hudson advocated for NYPA to focus on selecting, constructing and operating projects that avoid, minimize, and mitigate impacts to natural resources and maximize benefits to host communities. To that end, Scenic Hudson advocated that NYPA should prioritize development on previously disturbed land, avoid prime agricultural soils and promote agrivoltaics, protect wetlands, streams, forests, and open spaces, and use best practices during construction. Finally, Scenic Hudson recommended NYPA use their Solar Mapping Tool to help ensure that these issues are addressed.

The Adirondack Council advocated for NYPA to ensure that renewable development protects the natural resources of the Adirondack Park and its communities, ensuring that protections afforded by the New York

State Constitution, specifically Article XIV, are respected. The Adirondack Council also requested that NYPA clarify that it does not intend to use eminent domain outside of its transportation and transmission infrastructure projects and recognize the value of natural climate solutions, such as intact forests and wetlands, in combatting climate change. The Adirondack Council shared its siting considerations for renewable energy projects which include topics such as project placement, avoidance, wildlife protection, scale, utilization of previously disturbed sites, use of rooftop solar, and decommissions considerations. The Adirondack Council expressed reservations about the efficacy of agrivoltaics arguing that more pilot projects are needed to demonstrate effectiveness and noting that design should involve working with farmers to develop plans that will accommodate agricultural dual-use. In addition, the Adirondack Council urged NYPA to consider other dual use options, such as utilization of methane from agricultural waste for energy production.

## **Individuals**

NYPA heard diverse perspectives from many individuals, including that the Draft Plan should explore non-traditional sites for solar generation projects, such as floating panels on pumped storage reservoirs, solar canopies on parking areas, including those along the Thruway, solar generation on waste disposal areas, and a more general focus on building on brownfield sites. Other individuals recommended locating projects in specific communities and locations, including sites at Brooklyn College, Queens College, as well as SUNY and CUNY sites more generally. Some individuals expressed concerns about building on brownfield sites, indicating doubt that proper remediation would be done, as well as concerns about the need for backup generation to support renewables at schools and the amount of land required for renewable generation projects. Other individuals also expressed concerns with NYPA entering the distributed solar generation space, stating that there are other problems that would be a better use of NYPA's time and resources.

Some individuals advocated for the use of specific solar technology, such as solar wall boxes or single axis trackers. Others recommended the inclusion of geothermal projects, including repurposing certain sites for geothermal energy, such as closed mines. Other individuals questioned why NYPA, as a hydropower provider, did not include hydropower projects within the Draft Plan. While many individual commenters supported increased adoption of renewable energy systems, some individuals raised reliability concerns related to their intermittent nature. Others raised concerns with specific renewable energy projects, such as the Alle-Catt Wind Project, arguing against NYPA including the project in the Draft Plan due to concerns about the removal of forests, the potential for bat and bird fatalities, and noise.

Individuals expressed concerns with the use of eminent domain to advance renewable energy projects and the potential for solar energy systems to adversely impact agricultural productivity by occupying high-quality farmland and recommended limiting the conversion of agriculture land to no more than 10% of prime farmland. Some individuals noted how these issues are undermining public support for renewable energy in upstate communities.

Several commenters specifically referenced recent changes in law and regulations related to the siting of renewable generation and transmission, including the RAPID Act, as increasing their concerns about land use and community input. They questioned whether NYPA's timeline for building the proposed projects takes the new regulations into account. Other concerns were raised about renewable generation and transmission projects, including high costs, risks to the reliability of the electric grid, and perceived health and environmental risks, as well as concerns about the ability to recycle equipment used to produce renewable energy, such as solar panels, wind turbine blades, and concrete. For some individuals, these concerns led them to recommend that NYPA step back and revise its Draft Plan to address the potential for increased costs and reliability concerns, as well as to incorporate input from the NYISO. Several individuals residing on Long Island expressed concern over potential environmental impacts related to renewable energy generation and storage projects that may affect Long Island's sole-source aquifer system or the coastal marine environment. Other individuals residing on Long Island urged NYPA to build more projects on Long Island, viewing the Draft Plan as inadequate in this regard.

Some individuals viewed the Draft Plan as lacking many critical project details, including lacking a detailed plan for closing NYPA's peaker plants. Others asserted that the project selection process for the Draft Plan seems

to lack a competitive bidding process that would protect against insider deals and runaway costs, which they argue will imperil NYPA's excellent credit rating by taking on the risk associated with failing projects developed by out-of-state and foreign-owned companies. Some individuals suggested that NYPA should hold hearings in locations where projects are proposed in the Draft Plan and expressed concerns that the benefits from such projects would not be enjoyed locally.

NYPA received many coordinated individual comments advocating for more projects in the Draft Plan, increasing the total capacity of such projects from 3.5 GW to 15 GW, and emphasizing the need for community education. One individual requested that NYPA build a total of 16 GW of renewable capacity by 2030. However, other commenters raised concerns about the feasibility of adding a large amount of new renewable resources to the New York grid and expressed concerns over the reliability of a grid based predominantly on intermittent renewable resources.

Individuals commented in support of NYPA's Draft Plan, with one stating that the clean energy transition is a moral imperative, and that maintaining human dignity was at stake. Certain individuals commented that they had worked on renewable energy projects and view such projects as a means for gainful employment, while others saw them as an opportunity to partner with schools for educational opportunities, particularly schools that follow a PTECH model. Possible opportunities for NYPA that were put forward include expanding students' knowledge of green jobs and connecting them to job opportunities, tying real world jobs to curriculum coursework, utilizing stackable micro-credentials, and expanding experiential learning through internships, structured workplace visits and mentoring. Others recommended that NYPA look at additional technologies, such as biogas, and expressed support for additional transmission build out to support the deployment of renewable generation.

Some individuals commented in support of nuclear energy, and for NYPA building nuclear generation, asserting that nuclear generation provides more value to New Yorkers than renewable energy, such as wind and solar, due to the lower capacity factor of, and increased areas of land needed for, such renewable energy systems when compared to nuclear energy systems. Many of these same commenters criticized the recent closure of the nuclear facility at Indian Point, with several suggesting that the potential to reopen the facility should be explored. Another individual who supported nuclear proposed that the Draft Plan be paused until dispatchable emissions-free resources, which they argued would likely be nuclear, were proven feasible. However, other individual commenters expressed opposition to nuclear energy.

Many individuals spoke of their uncertainty of the prospect of a livable future, and expressed their desire to see the Draft Plan include 15 GW of renewable generation and storage capacity. Some of these individuals noted their reluctance to have children given this uncertainty, noting high levels of anxiety and depression in their communities. Other individual commenters shared personal stories of how their lives were impacted by climate change, with many individuals mentioning recent wildfires, Hurricane Irene, and Superstorm Sandy. One individual note that their peers have been resilient, but far from thriving due to constant upheaval.

Some noted air quality impacts in their communities, with one individual noting that the South Bronx has the highest asthma rates in the country. Multiple individuals from Astoria conveyed how their lives were significantly and adversely affected by respiratory issues and advocated for local solutions and 15 GW of renewables to help address air pollution in New York City. An individual from Brooklyn submitted a comment letter expressing how they would benefit greatly from the closure of fossil fuel power plants in Gowanus and the Narrows. They urged NYPA to build more renewable projects in New York City, utilizing parking lots and school rooftops, noting that the Draft Plan included only one proposed project in New York City. One resident of Bushwick noted that they have been unable to commute at times due to flooding and have thus far been unable to secure a green job, which has made them unsure of their future as a resident of New York City. Others recommended looking at environmental justice concerns outside of New York State, including those associated with the green energy supply chain. Many individuals expressed concerns about energy affordability and the overall cost of the transition, many of whom also voiced support for the REACH program.

Some individuals advocated for increasing the capacity of the Green Island Power Authority's hydropower facility from 6 MW to 42 MW, in line with a 2012 FERC approval to do so, and requested that NYPA look at additional hydroelectric power projects, such as the dam on Indian Lake. Others noted the lack of electric service in the wake of Superstorm Sandy, noting that local renewable energy systems, such as a solar carport at Jacob Riis Park and above-ground subway stations in New York City, would increase the resiliency of the electric grid in the aftermath of future storm events.

Several individuals noted the need to decarbonize buildings and the implicit need for a clean energy grid to support building electrification, with Local Law 97, offshore wind, and Tier 4 being key to achieving such a goal. One individual noted recent load growth caused in part by the proliferation of cryptocurrencies, and called into question the public benefit of such new loads in the context of an already challenged clean energy transition.

### **Labor Stakeholders**

NYPA received comments on the Draft Plan from a wide variety of Labor Stakeholders.

Representatives from various local chapters of the Laborers International Union of North America ("LIUNA") presented comments at hearings throughout the State. LIUNA representatives expressed that they are proud to be partnering with NYPA to ensure that the State's clean energy goals are met, citing NYPA's commitment to using local labor, driving local economic growth, and supporting family-sustaining jobs. LIUNA representatives noted the importance of prevailing wages, project labor agreements, and apprenticeship requirements. LIUNA representatives also noted that the projects included in the Draft Plan provide new opportunities for their members to work, that they appreciate NYPA's public-private partnership approach, and look forward to working together to get the projects built.

Northland Workforce Training Center thanked NYPA for prior support for their workforce development efforts and expressed support overall for the Draft Plan.

Various representatives of the International Brotherhood of Electrical Workers ("IBEW") also provided comments on the Draft Plan. IBEW Local 236 expressed a need to focus on creating permanent rather than temporary jobs. IBEW Local 1249 supported the majority of the Draft Plan, but expressed some concerns about project labor agreements, as the outside branch of the IBEW is not a member of the Building and Construction Trades Council. To address these concerns, they requested to participate early in the negotiating process for such agreements going forward. They also recommended that the State consider ways to utilize existing labor training facilities, such as theirs, for workforce development. Finally, they raised a few additional concerns including the near-term timing of the CLCPA goals, the need to support fossil fuel workers in the transition, and affordability. They further recommended that hydrogen and nuclear stay in the technology mix.

IBEW Local 1049 stressed the need to ensure that workers in traditional energy sectors, many of whom are union members, are not left behind, and supported NYPA's workforce training initiatives that are aimed at reskilling workers in fossil-fuel related industries. They also stressed the need to ensure that NYPA's Draft Plan utilizes and does not displace the existing union workforce. The IBEW Utility Labor Council of New York shared the views of the various locals included above, and underscored the need to ensure that NYPA's private sector partners do not outsource union jobs to non-union workers. The IBEW Utility Labor Council of New York also reiterated training and safety concerns, noting that the Draft Plan should include sufficient detail on how workers will be adequately trained and protected.

A representative of the Long Island Federation of Labor commended NYPA on the Draft Plan and stated that a critical element of NYPA's implementation of the Draft Plan is to comply with the labor requirements of the expanded authority, both directly and through NYPA's development partners. The representative noted legal requirements related to labor peace agreements, prevailing wage, and project labor agreements, arguing that such requirements are essential to ensure economic and environmental sustainability. The representative further underscored the importance of workforce training, specifically, the upskilling of utility and construction workers and ensuring a just transition for affected and displaced workers. Lastly, the representative urged NYPA to continue to prioritize engagement with labor stakeholders as it moves forward. They noted how

NYPA's 2024 conferral process was clearly improved from the 2023 conferral process in this regard, and that even more can be done to continually improve labor stakeholder engagement in the future.

Representatives of the Building and Construction Trades Council of Nassau and Suffolk Counties commended NYPA on the Draft Plan, and they urged NYPA and other commenters to take into account supply chain constraints that may limit the ability to build renewables in large quantities over short periods of time. They underscored the value of a steady pace for sustainable job growth and commented that the Draft Plan aligns with such an approach. The representatives underscored the need for cooperation and working together to expand workforce training initiatives for low-income individuals within the building and construction trades.

The Building Trades Employers' Association commented in support of the Draft Plan, noting the importance of investing in the green economy through the use of skilled union labor and minority- and women-owned business enterprises, and advocated for requirements to include apprenticeship programs to help create and maintain family-sustaining jobs in New York.

Climate Jobs NY submitted written comments applauding NYPA's efforts and advocating for the Draft Plan to include at least 15 GW worth of projects that incorporate prevailing wage, project labor agreements, and domestic manufacturing requirements to ensure that NYPA's efforts result in good jobs. In addition, they proposed that NYPA should prioritize building decarbonization and incentivize clean energy manufacturing to ease supply chain constraints. Finally, they recommended that NYPA utilize a more diverse range of technologies.

The AFL-CIO underscored the need for NYPA to adhere to State labor standards, such as those set forth under Public Service Law § 66-r and Labor Law § 224-d, and the need to ensure these requirements are passed onto NYPA's private sector development partners. The AFL-CIO also stated that NYPA should consider the benefits afforded by establishing an in-state supply chain for burgeoning technologies to attract manufacturing to the State and to ensure that any domestic content waivers are narrowly tailored with limited exceptions. Finally, the AFL-CIO advocated for NYPA to build 15 GW of new renewable energy generation.

### **Municipal Stakeholders**

A representative of the Albany County Executive noted that Albany County has previously enjoyed a good relationship with NYPA, including work on LED streetlight conversions and a recent solar energy project in the Town of Colonie, and that Albany County is looking forward to this relationship continuing. The representative expressed the view that the Draft Plan is a good first step representing the beginning, and not the end, of NYPA's efforts to build, own, and operate renewable energy systems.

The District Manager of Brooklyn Community Board 6 noted the imperative of investing in climate resilience, including renewable energy, noting that although 3.5 – 5 GW of renewable energy is good, 15 GW is best.

A representative of the New York City Comptroller's Office commented that recent changes in the federal government will necessitate state and local action on renewable energy, noting that New York City should be a priority in the Draft Plan and that the decommissioning of peaker plants should include a transition to battery energy storage.

The City School District of Niagara Falls expressed gratitude for both prior NYPA partnerships with their schools and the Draft Plan's workforce development efforts. They supported NYPA moving the Draft Plan forward and requested that NYPA continue partnering with school districts.

Westchester County noted their large electric bill, which would be even higher without the low rates currently provided by NYPA. They thanked NYPA for that, as well as their expertise and partnership in certain initiatives, such as electrifying their vehicle fleet, and exploring long-duration storage. Westchester County also noted the overall need for more renewable energy in the State.

The Town of Massena expressed support for the Draft Plan, noting NYPA's positive impact in the Town over the years associated with NYPA's St. Lawrence hydropower facility and neighboring transmission projects.



The Town noted NYPA's demonstrated commitment to community support, environmental protection, and public benefit for more than 60 years. The Town offered its support to NYPA related to the Draft Plan to further support economic development and the environment for years to come.

The Ulster County 70x30 Renewable Energy Implementation Plan (REIP) Working Group recommended that NYPA ease interconnection roadblocks for distributed solar by working with municipalities and utilities to develop interconnection improvements on (1) distribution feeders that had a large number of projects withdrawn after paying for a coordinated electric system interconnection review (CESIR) study and (2) on feeders identified by local governments as having several prospective locations for megawatt scale distributed solar. They also recommended including additional projects in the Hudson Valley.

### **Public Power**

One stakeholder, representing both the Village of Sherburne municipal utility and the New York Association of Public Power, stressed the need to focus on reducing energy costs to keep customers in communities while satisfying environmental objectives, and expressed support for NYPA's active role in promoting renewable energy at affordable rates. The Municipal Electric Utilities Association of New York State praised NYPA's low-cost hydropower as critical to the economic vitality of its members, and stressed that new initiatives, like building renewables, should only be pursued provided it does not adversely affect NYPA's core mission and ability to reliably provide clean, low-cost power. Further, they advocated that the cost of new renewable generation projects must be considered as they are selected for development, and urged NYPA to take a measured approach, including considering other solutions, such as long-duration storage and nuclear energy.

### **Renewable Energy Developers**

The Alliance for Clean Energy New York ("ACE NY") was generally supportive of NYPA's approach to public-private partnerships and suggested that NYPA clarify its criteria for selecting developers from its pre-qualified pool. In addition, ACE NY suggested that NYPA should consider expanding its rationale and criteria for selecting projects eligible for partnership. They suggested that NYPA review NYSERDA's project selection criteria to ensure that NYPA selects viable projects for partnership, and cautioned against selecting flawed projects in NYPA's efforts to rescue "at-risk" projects. ACE NY stated that they support NYPA using property owned by NYPA to develop projects. In addition, ACE NY recommended that NYPA continue to focus on transmission, citing the Smart Path and Central East Energy Connect projects as good examples to replicate. ACE NY also commented that it supports NYPA's efforts to retire its peaker plants and repurpose them for renewable energy, storage, and interconnection sites through a competitive process. Finally, ACE NY reiterated its support for NYPA's workforce training, outreach and education, and energy efficiency and transportation electrification initiatives.

The New York Solar Energy Industries Association ("NYSEIA") commended NYPA for its ambitious and comprehensive Draft Plan, and urged NYPA to ensure its efforts support, rather than compete with, New York's well-established distributed solar industry. In addition, NYSEIA encouraged NYPA to take a more active role in addressing policy and regulatory barriers, such as interconnection reform, siting reform, rate design improvement, and targeted program and incentives for uniquely beneficial projects. NYSEIA also noted the robust interest in NYPA's developer RFI and RFQ processes and suggested that it is essential for NYPA to establish clear and effective communication channels with developers to ensure that all stakeholders clearly understand their roles and responsibilities. NYSEIA further noted that developers must be made aware of the criteria for advancing to the next stages, as well as what steps are required to move forward.

A representative from Solar Liberty, a solar development company operating out of Buffalo, New York, noted a successful history of working with NYPA on solar projects, both rooftop and ground-mounted varieties, and energy storage projects. They described how the company's relationship working with NYPA on public projects for schools and local governments has helped it to grow and provide employment opportunities for approximately 85 workers in New York, which, hopefully, will continue into the future.

Acadia Energy Corporation requested that NYPA provide additional information on its proposed projects, including how each is supporting the CLCPA. They asked NYPA to clarify how projects can be added to the strategic plan, and inquired as to why the Draft Plan did not appear to prioritize partnerships with renewable energy developers headquartered in New York. BQ Energy, LLC, expressed support for NYPA building more than the 3.5 GW proposed. U.S. Light Energy expressed strong support for the Draft Plan and a desire to partner with NYPA in its implementation.

Ørsted expressed support for the Draft Plan, noting that it represents immense progress for the State's renewable energy goals, and how the inclusion of solar, onshore wind, and energy storage projects demonstrates a comprehensive approach to renewable energy. Ørsted also noted how NYPA's work to phase out its peaker plants, establish REACH, and provide funding for workforce training are critical initiatives that will benefit the region's communities and environment.

Epic Star Energy and NY-Best noted that NYPA is a strong partner to team with to develop projects in New York State and encouraged the investment community to actively seek to partner with NYPA to finance proposed projects contained in the Draft Plan. They stated that the Draft Plan is a generational opportunity to attract private investment with the advantage of leveraging NYPA's public role, financing capabilities, strong relationships with other State agencies, and NYPA's proven track record of creating strong relationships with communities where projects are located. They also encouraged NYPA to join the energy storage industry in sending a coordinated message concerning the importance of adopting a benefits approach to compensating energy storage projects for the ancillary services they provide.

Bloom Energy recommended that NYPA consider biogas fuel cells at Water Resource Recovery Facilities ("WRRFs") as potential projects to be included in the Strategic Plan. Bloom Energy states that such fuel cells fall within the definition of "renewable energy systems" in section 66-p of the Public Service Law. They said that when installed at WRRFs, biogas fuel cells can result in health benefits from the elimination of local air pollution from flaring or combustion, while providing demand reduction for WRRF operations.

Rise Light & Power recommended that NYPA should seek to catalyze its customer base to increase purchases of renewable energy in New York State. In addition, they expressed their preference that NYPA partner with, rather than compete against, private developers and focus its internal development efforts on hard-to-achieve goals, such as decarbonizing downstate New York. Finally, Rise Light & Power urges NYPA to use its unique financial capabilities to deliver cost-effective renewables through a public-private partnership model.