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STATE OF NEW YORK



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54TH DISTRICT

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RURAL RESOURCES

December 16, 2024

New York State Energy Planning Board
17 Columbia Circle
Albany, NY 12203

Dear Members of the New York State Energy Planning Board,

As State Senator for New York's 54th District, I am writing to provide comments on the proposed updates to the New York State Energy Plan. The Energy Plan should provide an honest review of CLCPA goals, examine the true costs of CLCPA mandates, and consider the potential impact on energy affordability, grid resiliency, economic opportunity, and consumer choice. In instances where the cost of implementing CLCPA mandates proves to be prohibitive, or where alternative energy sources and technology have not been sufficiently developed, the Energy Plan should recommend delaying these mandates.

As the state continues its attempt to transition to 100% zero-emission electric generation by 2040, the reliability and safety of our grid is a top concern to my constituents. The recently published *2024 Reliability Needs Assessment* from the New York Independent System Operators (NYISO) paints a grave picture of our grid's reliability forecast, predicting narrow statewide reliability margins by 2034 that will leave New Yorkers extremely vulnerable to severe weather events. As outlined in the report, this challenge will be exacerbated by growing energy demand and mandates related to electric vehicles and building electrification. The State Energy Plan must assess the very clear data at hand and consider the consequences of moving forward with these policies before alternative energy sources are cost-effective and commercially viable. The safety and well-being of New Yorkers should be the foremost priority.

Maintaining the reliability of the grid and ensuring the accessibility of energy are also crucial for the state's economic development and housing goals, especially in the 54th Senate District. A reliable energy supply is needed both for the operation of new and existing businesses and to construct the housing needed to accommodate the state's workforce. As many have said previously, homes are where jobs go at night, and an adequate supply of workforce housing is key to any economic development initiative. With exciting developments such as the anticipated arrival of Micron and the designation of the NY SMART I-Corridor Tech

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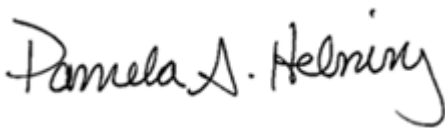
Hub, we must ensure that housing is available to support these and other economic development opportunities. Issues with grid capacity and transmission systems are already preventing the development of needed housing stock, with hundreds of units of new housing currently on hold in the Finger Lakes region alone. The New York State Energy Plan must take these concerns into consideration and ensure that reliable, affordable energy is available to power economic development.

Energy affordability is an issue of great importance to my constituents. As highlighted by Comptroller Tom DiNapoli in July 2024, the state has yet to provide a comprehensive cost assessment of the energy transition or provide clear sources of funding. As the audit suggests, this means that ratepayers and taxpayers are the de facto source of funding for the unprecedented levels of transmission infrastructure and new renewable energy sources that the CLCPA goals would require. This is unacceptable at a time when New York residents and businesses are already struggling with high energy costs.

The Comptroller's findings also do not account for the increased costs consumers would face due to electric vehicle and building electrification mandates. Schools in my district are deeply concerned about upcoming requirements to purchase zero-emission buses by 2027, and rightfully so considering electric buses can cost upwards of \$400,000 and may not have the range necessary to serve rural areas like those I represent. There are also serious concerns about student safety given the current limitations of electric buses and the impact charging times could have in instances of early or emergency closure. This is just one example of New York's mandates outpacing the cost-effectiveness and practicality of zero-emission alternatives, and consumers should not be forced to switch to implements that are not yet competitive to existing technologies.

The 2025 State Energy Plan presents an opportunity to examine these concerns and shift the state towards realistic energy goals that do not further burden New York residents and businesses. I urge the Board to perform a thorough analysis of all impacts of CLCPA mandates and to adjust to responsible, pragmatic timelines for clean energy development.

Sincerely,

A handwritten signature in cursive script that reads "Pamela A. Helming". The signature is written in black ink and is positioned above the typed name.

Pamela A. Helming
Senator, 54th District