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Senator Leroy Comrie, Chair

Senate Committee on Corporations, Authorities and Commissions

Senator Kevin Parker, Chair

Senate Committee on Energy and Telecommunications

Re: Testimony for Joint Hearing on Public Service Commission Proceedings

Chair Parker, Chair Comrie, and Members of the Committees:

Thank you for the opportunity to provide testimony on behalf of Advanced Energy United for this important oversight hearing. Advanced Energy United is a national trade association representing more than 100 businesses providing clean energy technologies and services.

The Public Service Commission (PSC) and Department of Public Service (DPS) carry an extraordinary responsibility. They are tasked with guiding New York's energy system through a period of historic change—maintaining safe, reliable, and affordable service while simultaneously implementing the ambitious climate goals of the Climate Leadership and Community Protection Act (CLCPA). I want to begin by recognizing the dedication of PSC and DPS staff, who work across dozens of proceedings despite significant complexity and resource constraints. As stakeholders in many of those proceedings, we understand how difficult it is to manage the robust workstreams.

To help ensure cost-effective investments, avoid spending more than we need to, modernize our energy planning process to account for new evolutions and innovations, and find administrative and regulatory efficiencies where they might exist, the PSC can begin to explore integrated planning. Gas and electric utilities have historically planned their systems independently. That approach was adequate when gas and electric demand were unrelated. But the growth in the electrification and home energy technology market is fundamentally changing this dynamic. Now, decisions made on the electric system can directly influence costs and infrastructure needs on the gas side, and vice versa. Given this increasing interplay between the energy types, siloed

planning for combination gas and electric utilities is inefficient and opens up the potential for either over- or under-building infrastructure.

As the State Draft Energy Plan (Natural Gas, Section 4.3.2 and Electricity, Section 4.4) highlights, if customers in a particular area electrify their heating using an electric utility incentive, a gas utility may be able to reduce or avoid investment in that part of the gas system *if* gas utilities know about it. If a gas utility invests in a highly efficient thermal energy network that also reduces summer AC load, the electric utility may need to modify its distribution system investment plans. Without coordinated planning, opportunities to reduce costs and optimize investments are easily missed.

Integrated planning would allow the PSC to explore:

- Identifying and capturing cost savings by avoiding unnecessary or duplicative infrastructure investments.
- Strengthening system reliability by ensuring coordinated upgrades across both energy systems.
- Advancing CLCPA compliance by guiding an orderly, data-driven transition.
- Streamlining its proceedings by creating a framework where gas and electric planning are considered together, reducing the number of fragmented dockets staff must manage.

Recognizing these benefits, Senator Comrie sponsors legislation (S.5995) directing the Commission to establish an integrated planning framework for New York's utilities. The bill provides the PSC with the direction and authority it needs to advance this work, consistent with the direction outlined in the Draft State Energy Plan.

Importantly, integrated planning is not a rigid or prescriptive set of requirements. It is a flexible framework for modernizing utility planning practices so that PSC decisions better reflect today's interconnected energy landscape. The Energy Plan identifies several potential strategies—such as linking gas and electric modeling, improving data sharing and mapping, and restructuring utility planning teams to consider both systems together. These are pragmatic steps that would help DPS and PSC make more informed, cost-conscious, and forward-looking decisions.

Thank you for your consideration and for your leadership in ensuring that New York's regulatory processes are aligned with the state's climate and affordability goals.

Respectfully,

Kristina Persaud

