



September 16, 2025

State Energy Plan Comments  
New York State Energy Research and Development Authority  
17 Columbia Circle  
Albany, NY 12203-6399

**Re: Draft State Energy Plan Written Comments**

Dear NYSERDA Board,

We write to strongly oppose the Draft State Energy Plan (the “Draft Plan”) published by the New York State Energy Planning Board (the “Board”).

The Draft Plan rightly notes that “the availability of reliable electric power at reasonable rates is the backbone of the State’s economy and critical to public health and safety.” Unfortunately, its proposals would undermine reliability while driving up costs for New Yorkers.

The State’s rapid transition away from dependable energy sources such as natural gas in favor of intermittent renewables will place enormous strain on the grid and burden families and businesses with higher utility bills.

New York’s electricity demand will grow dramatically in the coming decades, fueled by forced electrification under the Climate Leadership and Community Protection Act (CLCPA) and large new industrial loads such as data centers and semiconductor facilities. The New York Independent System Operator (NYISO) estimates New York will need 111 - 124 gigawatts of installed generation capacity by 2040<sup>1</sup> to meet the mandates under the CLCPA – roughly triple today’s grid.

The Draft State Energy Plan relies disproportionality on wind, solar and battery storage while downplaying reliable sources of energy like natural gas and nuclear. Wind and solar are not reliable sources of energy, especially in New York, where much of the State experiences long

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<sup>1</sup> Page 21 of *2021-2040 System & Resource Outlook*, New York Independent System Operator. September 22, 2022

stretches without seeing the sun<sup>2</sup> and days when the wind is not blowing. The Executive Director of New York's Office of Renewable Energy Siting said in a New York State Senate Energy Committee meeting on March 28, 2023, that land-based wind turbines only generate about 20% to 26% of their capacity while solar panels only generate about 13% or 14% of their capacity.

Wind energy is further undermined by frequent lulls. On average, New York experiences 30 lulls each year lasting 24 hours, seven lasting 48 hours, and three lasting 72 hours. These gaps in output occur regardless of demand. At the same time, peak energy demand in New York occurs in the evening during periods of extreme heat or cold, precisely when solar power produces nothing and high-pressure weather systems often leave wind turbines idle.

Despite these challenges, the CLPA mandates at least 9 gigawatts (GW) of offshore wind by 2035 and plans to develop as much as 18 GW of wind power by 2050. That's roughly equal to 18 or more nuclear/natural gas power plants. A lull in wind dropping output to 5-20% is equal to having 14 to 17 power plants coming offline at once.<sup>3</sup>

Battery storage technology remains expensive, limited,<sup>4</sup> and carries safety risks when sited near residential areas.

Meanwhile, renewable development is already lagging. In 2023, solar produced about 5% of New York's power and wind, just 4%, despite mandates for rapid expansion.<sup>5</sup> Projects face rising costs, supply chain challenges, and significant local opposition, from offshore wind proposals on Long Island to large solar farms upstate. Opposition has been so strong that the Democratic Majorities in the Legislature and the Governor enacted the Renewable Action Through Project Interconnect and Deployment Act (RAPID Act) to override local input and fast-track projects.

The scale of land needed for solar alone is staggering. NYISO estimates 39,262 megawatts (MW) in capacity must be sourced from grid-connected solar, as opposed to behind-the-meter solar (such as residential rooftop panels) to meet the CLCPA's mandate of 100% renewable electricity by 2040. The largest proposed project, the 500 MW Cider Solar facility, would cover 2,500 acres.<sup>6</sup> Extrapolated out, that means to generate 39,262 MW of solar energy, roughly 200,000 acres across the State will be blanketed in solar panels. Not to mention the environmental impact of building and disposing of these millions of solar panels.

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<sup>2</sup> Buffalo has 54 sunny days a year, Rochester has 61 sunny days, Syracuse has 63 sunny days, and Albany has 69 sunny days. In comparison, Los Angeles has 284 days of sun a year and Phoenix has 300 days of sun.

<sup>3</sup> Hanley, James E., *Offshore Wind Lulls Threaten NY Energy Reliability*. August 3, 2023. Empire Center at [Offshore Wind Lulls Threaten NY Energy Reliability - Empire Center for Public Policy](#)

<sup>4</sup> Solar power can only be stored in a battery pack for one to five days.

<sup>5</sup> *New York State Energy Profile*, U.S. Energy Information Administration.

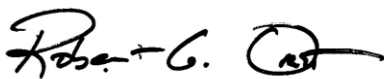
<sup>6</sup> Fischer, Anne. *New York's Largest Solar Power Plant Moves Forward*. PV Magazine, April 8, 2025 at: [New York's largest solar power plant moves forward – pv magazine USA](#)

Just as troubling as the reliability risks tied to a rapid transition to an all-electric grid are the staggering costs for New Yorkers. A conservative estimate by the Climate Action Council puts the total price tag of reaching an emissions-free grid by 2050 at \$340 billion. That breaks down to roughly \$17,100 per New Yorker. These costs are not theoretical; they are already beginning to materialize in the form of rising utility bills. Given that the State is still in the early stages of this transition, the financial burden on households and businesses is poised to increase substantially in the years ahead.

In addition to skyrocketing utility bills, an “all-electric” future will also drive-up household costs. For example, banning natural gas and propane will force homeowners toward geothermal heat pumps costing \$15,000–\$35,000 (and up to \$50,000 for large homes), compared to \$3,000–\$8,000 for a new gas furnace. Prohibiting gas-powered vehicles will compel consumers to purchase higher-priced electric vehicles, further reducing choice.

New York needs an “all of the above” energy strategy that prioritizes affordability, reliability, and consumer choice. The CLCPA mandates should be repealed, and the State should craft a realistic energy plan that includes—not excludes—reliable, safe, and affordable energy sources. Only then can New York secure a stable and affordable energy future.

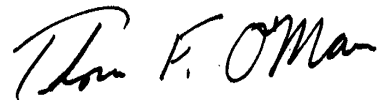
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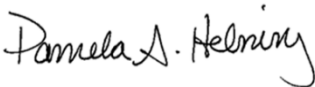
Robert G. Ort  
Senate Minority Leader  
62<sup>nd</sup> District



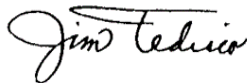
Senator Andrew Lanza  
24<sup>th</sup> District



Senator Tom O'Mara  
58<sup>th</sup> District



Senator Pam Helming  
54<sup>th</sup> District



Senator Jim Tedisco  
44<sup>th</sup> District



Senator Steve Chan  
17<sup>th</sup> District



Senator George Borrello  
57<sup>th</sup> District



Senator Daniel G. Stec  
45<sup>th</sup> District



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8<sup>th</sup> District



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43<sup>rd</sup> District



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5<sup>th</sup> District



Senator Rob Rolison  
39<sup>th</sup> District



Senator Mario Mattera  
2<sup>nd</sup> District



Senator Anthony Palumbo  
1<sup>st</sup> District



Senator Patricia Canzoneri-Fitzpatrick  
9<sup>th</sup> District



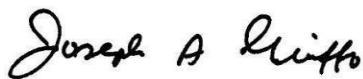
Senator Peter Oberacker  
51<sup>st</sup> District



Senator Patrick Gallivan  
60<sup>th</sup> District



Senator Mark Walczyk  
49<sup>th</sup> District



Senator Joseph Griffo  
53<sup>rd</sup> District



Senator William Weber  
38<sup>th</sup> District



Senator Jack M. Martins  
7<sup>th</sup> District



Senator Dean Murray  
3<sup>rd</sup> District