

Senator Pam Helming

Representing the 54th New York Senate District



September 22, 2026

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

**Re: Case 15-E-0302 — Comments on the Draft 2026 Clean Energy Standard
Biennial Review**

Dear Secretary Phillips,

As the State Senator representing the 54th Senate District, I submit these comments on the Draft 2026 Clean Energy Standard Biennial Review. I respectfully request that they be included in the official record of this proceeding.

My constituents are increasingly concerned about rising utility bills and whether New York will have the reliable, affordable energy needed to support our communities.

I hear from seniors who have worked their entire lives, paid off their homes, and now worry about whether they can afford to stay. Rising utility bills and property taxes are taking a growing share of their fixed incomes. Where will they go if the costs become more than they can manage?

Our farmers, manufacturers, and small businesses need affordable, dependable energy to operate and grow. Major investments, including the Fairlife manufacturing facility in Webster, create opportunities for our region and the dairy farmers who supply it. But those opportunities depend on reliable power and infrastructure that can support future growth.

We also need electricity to build the housing our communities desperately need. Across multiple counties in my district, housing projects have already been delayed because sufficient electric capacity was unavailable or the cost of extending service was simply too high.

The Draft Biennial Review projects significantly greater electricity demand by 2030, while expected renewable generation remains well below the state's statutory target. How much will it cost to close that gap? Who will pay for the additional generation,

storage and transmission? And can New York maintain reliable service as demand continues to grow?

In July 2024, State Comptroller Thomas DiNapoli found that the costs of transitioning to renewable energy had not been reasonably estimated, leaving ratepayers as the primary identified funding source. He recommended detailed cost estimates, regular public reporting, and an assessment of how much of the financial burden ratepayers can reasonably bear.

Two years later, what has changed?

NYSERDA's February 2026 analysis of potential Climate Act compliance costs raises additional affordability concerns, particularly for Upstate households and businesses.

I ask the Commission to explain how it has addressed the Comptroller's recommendations, how NYSERDA's potential cost projections are being considered in Clean Energy Standard planning, and what additional costs ratepayers may face.

That analysis should identify the expected impact on monthly utility bills, including the costs of generation, storage, transmission, and maintaining reliable service. It should distinguish current costs from projected future costs, account for expected benefits and savings, and assess the impacts on residential, agricultural, commercial and industrial customers, particularly in the NYSEG and RG&E service territories.

I am also concerned about reliability. NYISO's 2026 Power Trends report and its reliability assessments examine growing electricity demand, generator retirements and the availability of replacement resources. As New York moves toward greater electrification, the Commission must account for the additional demand created by state mandates and ensure sufficient generation and grid infrastructure are available.

For many of my constituents, reliable electricity is more than a matter of convenience. I have heard directly from residents of senior living facilities and group homes who are concerned about losing power. An extended outage can put their health and safety at risk. It can also leave rural families without heat or running water, disrupt dairy operations and food processing, and affect emergency services.

I ask the Commission to explain how its planning aligns with NYISO's reliability assessments and accounts for existing electric capacity constraints, connection costs, and infrastructure delays that are already affecting housing and economic development in Upstate communities. Where these concerns fall outside this review, they should be addressed through appropriate utility planning and rate proceedings.

Cost allocation is equally important. Our residents and businesses should not be expected to absorb costs attributable to large new electric loads or infrastructure investments that primarily benefit other regions.

As data centers and other large electricity users seek access to New York's grid, the Commission should clearly identify who benefits from new generation and transmission investments, who is responsible for those costs, and how existing ratepayers will be affected.

Ontario, Wayne and Livingston, as well as parts of Monroe counties are home to productive farmland, important water resources and natural landscapes that contribute to our economy and quality of life.

Has the Commission quantified how many additional acres of prime agricultural soils may be affected by renewable-energy development, how much land could be removed from agricultural production, and what cumulative impacts may result for our farms and natural resources? I also ask the Commission to work with DEC to evaluate potential risks to soil and water from materials used in solar panels, including PFAS where present, and determine whether existing safeguards adequately address damaged panels and end-of-life disposal.

Opportunities to develop renewable energy on rooftops, brownfields, major parking areas, and previously disturbed sites should also be fully considered.

Local decision-making must also be considered as New York plans for additional renewable-energy development. The Office of Renewable Energy Siting and Electric Transmission (ORES) has final permitting authority over major renewable-energy projects and may override local laws. While municipalities can participate, Home Rule is ignored, and their ability to determine how projects affect their communities is significantly limited. The Commission should account for these limitations when evaluating the cumulative impacts of meeting the state's renewable-energy targets on farmland, water resources, and rural communities.

I respectfully request that the Commission address these concerns in its final Biennial Review, with a clear accounting of expected costs, reliability needs, and impacts on Upstate communities.

Sincerely,



Pamela A. Helming
Senator, 54th District