

# Understanding the Economic Implications of Champlain Hudson Power Express on New York's Energy Market

The statement regarding Champlain Hudson Power Express (CHPE) highlights significant concerns about the project's economic impact on New York's energy market structure, particularly relating to subsidies that far exceed current energy prices and potential increases in capacity requirements that could burden New York City ratepayers. The assertion reveals fundamental tensions between renewable energy policy goals and market economics, where large-scale transmission projects receive substantial financial support while potentially creating additional costs through changes to the state's capacity market structure.

## The Champlain Hudson Power Express Project Structure

The Champlain Hudson Power Express represents a major renewable energy transmission initiative designed to deliver 1,250 megawatts of Canadian hydropower to New York City through a 339-mile fully buried transmission line<sup>[1]</sup>. Developed by Transmission Developers, which is backed by private equity firm Blackstone, the project emerged as one of two selected proposals under NYSERDA's Tier 4 program in 2021<sup>[1] [2]</sup>. The transmission line will primarily run under the Hudson River and existing rail lines, connecting the Canadian border to New York City to provide clean energy capable of powering over one million homes<sup>[1]</sup>.

The project's selection represents New York State's strategic effort to transition away from fossil fuel dependency, particularly addressing New York City's current reliance on fossil fuel-fired generation for approximately 90 percent of its electricity<sup>[1]</sup>. Governor Kathy Hochul's administration positioned CHPE as critical infrastructure for achieving the state's Climate Leadership and Community Protection Act goals, with projections indicating the project will reduce carbon emissions by 37 million metric tons statewide<sup>[1]</sup>. Beyond environmental benefits, CHPE promises substantial economic impacts, including 1,400 family-sustaining jobs and \$1.4 billion in tax revenue for communities throughout New York State over 25 years<sup>[1]</sup>.

The project's financing structure operates through NYSERDA's innovative Tier 4 program, which procures both renewable energy and new transmission capacity using an indexed renewable energy credit (REC) structure designed to "help cushion customers against spikes in energy prices so when electricity prices rise the Tier 4 program costs go down"<sup>[2]</sup>. This approach represents a departure from traditional energy procurement methods, creating a complex relationship between market prices and program costs that has significant implications for ratepayers.

## **NYSERDA Subsidies Versus Market Prices**

### **Subsidy Structure and Magnitude**

The financial disparity between CHPE's contracted rates and current market prices reveals the substantial subsidy embedded in the project. Under the finalized contract structure, CHPE operates with an Index Tier 4 REC strike price beginning at \$97.50 per Tier 4 REC in the first year and escalating to \$176.36 per Tier 4 REC by the 25th year of the contract<sup>[2]</sup>. These prices represent the guaranteed payment rates that CHPE will receive for its renewable energy credits, forming the foundation of the project's revenue stream and representing a significant premium above current market rates.

When compared to recent New York City Locational Based Marginal Pricing (LBMP), the magnitude of this subsidy becomes apparent. December 2023 data shows NYC LBMP at \$33.67 per MWh, with the year-to-date average of \$39.12 per MWh representing a 56% decrease from the previous year's \$89.23 per MWh<sup>[3]</sup>. These market prices reflect the actual cost of energy delivery in New York City's wholesale electricity market, providing a baseline for understanding the premium embedded in CHPE's contracted rates.

The subsidy multiples are striking when examining the relationship between contracted payments and market prices. CHPE's initial year strike price of \$97.50 per MWh represents approximately 2.5 times the current LBMP levels, while the 25th year price of \$176.36 per MWh reaches more than four times current market rates<sup>[2]</sup>. This escalating premium structure ensures CHPE's financial viability regardless of market conditions but transfers substantial costs to New York ratepayers through the Tier 4 program mechanism.

### **Ratepayer Impact and Cost Distribution**

NYSERDA's analysis projects that the combined Tier 4 program, including both approved projects, will result in an expected average bill impact of approximately 2% for customers, translating to just over \$2 per month once the projects enter operation<sup>[2]</sup>. However, this analysis relies on averaged projections that may not fully capture the long-term cost implications of the escalating price structure built into CHPE's contract. The indexed REC mechanism creates a complex relationship between energy market prices and program costs, where declining market prices could increase the effective subsidy burden on ratepayers.

The cost distribution mechanism operates through New York's utility rate structure, where Tier 4 program costs are allocated across the state's electricity customers according to established formulas. This approach socializes the costs of renewable energy infrastructure development while concentrating the benefits in specific geographic areas, particularly New York City, which receives the direct energy supply benefits. The long-term nature of the 25-year contract also locks in escalating subsidy payments that will continue regardless of future market developments or technological changes that might reduce renewable energy costs.

# Locational Capacity Requirements and Market Dynamics

## Understanding LCR Framework

Locational Capacity Requirements (LCRs) represent a critical component of New York's electricity market structure, establishing minimum installed capacity requirements for specific geographic zones to ensure system reliability<sup>[4]</sup> <sup>[5]</sup>. The New York Independent System Operator (NYISO) calculates these requirements annually using Multi-Area Reliability Simulation (MARS) modeling to determine the capacity needed to maintain system reliability with a loss of load expectation (LOLE) criterion of no more than 0.100 event-days per year<sup>[4]</sup> <sup>[5]</sup>.

For the 2024-2025 capability year, NYISO established specific LCR percentages for different zones, with New York City (Zone J) requiring 22.0% and Long Island (Zone K) requiring 80.4%<sup>[4]</sup>. These requirements reflect the transmission-constrained nature of these load centers, where limited transmission capacity from upstate generation sources necessitates local capacity resources to maintain reliability. The G-J Locality, encompassing Load Zones G, H, I, and J, faces a requirement of 105.3%<sup>[4]</sup>, indicating significant transmission constraints that require substantial local capacity resources.

The LCR calculation process involves complex modeling that considers transmission limitations, load forecasts, and generation availability across the state's interconnected system<sup>[5]</sup>. Any changes to transmission capacity or generation resources can potentially impact these requirements, as the system's ability to import power from external sources directly affects the local capacity needed to maintain reliability standards.

## CHPE's Potential Impact on Capacity Requirements

The concern regarding CHPE's impact on LCR calculations stems from the complex relationship between transmission imports and local capacity requirements in New York's market structure. While additional transmission capacity typically reduces local capacity requirements by enabling greater power imports from external sources, the specific characteristics of CHPE and its integration into the system could create counterintuitive effects on capacity calculations.

CHPE's classification as an external resource importing power from Canada means that its capacity contribution to New York's system may be treated differently in reliability calculations compared to internal generation resources. The NYISO's methodology for determining LCRs considers the reliability characteristics of different resource types, and external transmission-dependent resources may face different treatment in capacity calculations due to potential forced outage rates, maintenance requirements, or external system dependencies that could affect their availability during peak demand periods.

Furthermore, the addition of significant external capacity through CHPE could potentially alter the overall system dynamics in ways that affect capacity requirements in other zones. If CHPE's capacity primarily serves New York City but affects the broader state's capacity calculations, it could potentially increase requirements in other areas as the system rebalances its reliability parameters. This redistribution of capacity requirements could result in increased costs for capacity procurement across the state, even as New York City benefits from additional supply.

## **Economic Implications of Capacity Cost Increases**

The potential for CHPE to increase capacity costs represents a significant economic concern for New York's electricity market participants and consumers. Capacity costs in New York's market are determined through competitive auctions where generators bid to provide capacity services, with clearing prices established based on the intersection of supply and demand curves within each capacity zone. Any increase in capacity requirements directly translates to increased procurement costs that are ultimately passed through to electricity consumers.

If CHPE's integration results in higher LCR values across New York State, the increased capacity procurement requirements would drive up capacity market clearing prices, creating additional costs beyond the direct Tier 4 program payments. These capacity cost increases would affect all electricity consumers in the affected zones, creating a secondary cost impact that compounds the direct subsidy costs embedded in CHPE's revenue structure. The magnitude of this potential impact depends on the specific changes to LCR calculations and the responsiveness of capacity supply to increased requirements.

The economic efficiency concerns arise from the potential for CHPE to simultaneously receive substantial subsidies while contributing to increased system-wide costs through capacity market effects. This dual cost impact raises questions about the overall economic efficiency of the project and whether the environmental and energy security benefits justify the combined financial burden on New York's electricity consumers.

## **Broader Market and Policy Implications**

### **Renewable Energy Transition Costs**

The CHPE case exemplifies broader challenges in financing large-scale renewable energy infrastructure transitions, where policy goals of rapid decarbonization create pressure for expedited project development that may not align with optimal economic efficiency. The substantial subsidies required to make projects like CHPE financially viable reflect the current gap between renewable energy infrastructure costs and market prices, highlighting the ongoing need for public support to achieve environmental policy objectives.

The escalating price structure built into CHPE's contract also reflects uncertainties about future market conditions and the need to provide long-term revenue certainty to attract private investment in large-scale infrastructure projects. While this approach ensures project viability and enables renewable energy development, it also transfers market risk from private developers to public ratepayers, raising questions about appropriate risk allocation in public-private energy infrastructure partnerships.

## **System Planning and Integration Challenges**

CHPE's development illustrates the complex challenges of integrating large-scale renewable energy resources into existing electricity market structures designed around traditional generation resources. The project's potential effects on capacity requirements demonstrate how new transmission and generation resources can create unintended consequences in market

mechanisms, requiring careful analysis and potentially adaptive market design changes to optimize system economics.

The long-term nature of CHPE's contracts and its significant scale relative to New York's electricity system also raise questions about system planning flexibility and the ability to adapt to future technological developments or changing energy needs. As battery storage, distributed generation, and other emerging technologies develop, the fixed commitments to large-scale transmission projects may limit system optimization opportunities or create stranded cost risks for ratepayers.

## Conclusion

The statement regarding Champlain Hudson Power Express reveals fundamental tensions in New York's renewable energy transition between environmental policy goals and economic efficiency. CHPE's contracted subsidy rates, beginning at \$97.50 per MWh and escalating to \$176.36 per MWh over 25 years, represent multiples of current NYC LBMP rates of approximately \$33-39 per MWh, creating substantial ratepayer costs through the Tier 4 program mechanism<sup>[2]</sup> <sup>[3]</sup>. These subsidies, while necessary to enable large-scale renewable energy infrastructure development, illustrate the significant public financial commitment required to achieve rapid decarbonization goals.

The concern about CHPE's potential impact on Locational Capacity Requirements adds another layer of economic complexity, where the project could simultaneously receive substantial subsidies while contributing to increased system-wide capacity costs. This dual cost impact raises important questions about the overall economic efficiency of New York's renewable energy transition strategy and the appropriate balance between environmental benefits and ratepayer costs. As New York continues implementing its aggressive climate goals, careful analysis of projects like CHPE will be essential to ensure that environmental progress is achieved in the most economically efficient manner possible, minimizing unnecessary burden on electricity consumers while maximizing system benefits.

The CHPE case ultimately reflects broader challenges in renewable energy policy implementation, where the urgency of climate action creates pressure for rapid project development that may not optimize economic efficiency. Addressing these challenges will require continued refinement of market mechanisms, improved integration of environmental and economic planning, and careful consideration of long-term ratepayer impacts in renewable energy infrastructure decisions.

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