

Pragmatic Environmentalist of New York Summary Update June 16, 2025 – June 29, 2025

This is a summary update of posts at [Pragmatic Environmentalist of New York](#) over the last two weeks. I have been writing about the pragmatic balance of the risks and benefits of environmental initiatives in New York since 2017 with a [recent emphasis](#) on New York's [Climate Leadership & Community Protection Act](#) (Climate Act). This summary describes each of my recent posts. If you do not want to be on this mailing list, then let me know. A pdf copy of the following information and previous summaries are also [available](#). The opinions expressed in these articles do not reflect the position of any of my previous employers or any other organization I have been associated with, these comments are mine alone.

[In Search of the Climate Act Safety Valve](#)

I have been arguing for years that Public Service Law (PSL) [Section 66-P](#) includes safety valve provisions for safety and reliability that should be addressed. Like minded individuals that share similar frustrating experiences trying to warn New York that their Climate Act ambitions will end badly convinced me to try to raise our issues in rate case proceedings. As a result, my attentions were directed elsewhere and there were only four posts since my last update. This post was written as part of my research for one of the rate case proceedings where I tried to find references to the PSL Section 66-P(4) safety valves.

The DPS [Document and Matter Management](#) (DMM) system is the online repository for all cases before the Public Service Commission. There are thousands of cases in the system and individual cases can have [thousands of filings](#). Before the availability of artificial intelligence programs, it was impossible for me to determine how many of the filings in the system referred to the safety valve provisions in 66-p(4). Now I can check out whether anyone besides me is questioning this requirement.

My [Perplexity AI search](#) found that I am not the only one who has referenced this provision in official filings. However, it has not been invoked, and a check of the findings suggests that no agency has evaluated the provisions to see if the Public Service Commission should consider a hearing.

The [Comptroller report](#) audited Climate Act progress and acknowledges the safety valve and then makes the ultimate point:

PSC's mission is to ensure affordable, safe, secure, and reliable access to utility services for the State's consumers at just and reasonable rates while protecting the natural environment and to stimulate effective competitive markets for clean, renewable, and distributed energy resources along with product and service innovations to benefit consumers. PSC thus must determine if the rates are reasonable for both the consumer and the producer so that New York can successfully transition to the level of renewable energy it desires to achieve.

Eventually I will describe how I tried to get the Department of Public Service to acknowledge that it would be appropriate to consider the safety valves.

[Energy Plan Board 25 June 2025 Meeting](#)

This article described the latest Energy Planning Board meeting to discuss the Energy Plan. According to the [New York State Energy Plan website](#):

The State Energy Plan is a comprehensive roadmap to build a clean, resilient, and affordable energy system for all New Yorkers. The Plan provides broad program and policy development direction to guide energy-related decision-making in the public and private sectors within New York State.

Given its importance for New York's energy future, I set up my [Energy Plan page](#) that provides background information and a list of all my related articles. I intend to keep writing about these meetings in hopes that Board members will read about the other side of the story here.

This article summarizes the meeting. My intent is to follow up with other posts on items discussed. The presentations were notable because they recognized that there were problems with the transition. The severity of the problems and the number of problems was not acknowledged but it is a start.

The report talks about the importance of affordability, but presenters did not acknowledge that the Informational Report describing progress and costs of the Climate Act transition is a year late. If affordability is a goal and not a slogan then why aren't they telling us how much it has cost to date?

There is another worrisome aspect of the presentations. The process is disturbingly like the Scoping Plan development process in which the NYSEDA expert presentations to the voting entity were tightly scripted and there were very few questions. I am particularly concerned that some of the language appears to be setting up the same misleading analysis of only a subset of the efforts needed to achieve the Climate Act targets. That underestimates costs and resources required.

[Energy Plan 25 June 2025 Meeting – Electricity Topic](#)

This article is the first to delve into specific items discussed. I should also note that my friend Tom Shepstone [described the natural gas section](#) so I don't have to do that one.

I have takeaway messages from the electricity topic for the Energy Planning [members](#). The impression I got from the presentations at the 25 June 2025 Energy Plan meeting is that NYSEDA and DPS have the implementation of the Climate Act under control. It cannot be emphasized strongly enough that the reality is different. In the real world the presentations only scraped the surface of the number and magnitude of the issues facing New York's implementation of the Climate Act.

Reading between the lines reveals that the draft Energy Plan concedes the electric system transition is not well planned. Consider that [New York State](#) will "advance smart and strategic energy system planning" is predicated on coming up with ways to do that. If they are "assessing, exploring and evaluating" ways to be smart, then what does that say about current planning? My Google AI Assistant says the opposite would be "unstructured or haphazard planning, which lacks clear goals, measurable outcomes, and a coherent approach to achieving objectives". That describes Climate Act implementation perfectly.

Finally, there are multiple references to stakeholder input in this presentation. Until NYSERDA documents how they treated stakeholder input, the implication that they value this input rings hollow.

There is every indication that slavish devotion to the aspirational goals of the Climate Act is still the goal of the Energy Plan process. At the same time NYSERDA and DPS claim that the transition “must be managed within the constraints imposed by Federal and State reliability requirements and at a justifiable cost to ratepayers”, there are no quantifiable criteria for affordability and reliability. If there were safety valve criteria, then I have no doubt that they would be exceeded because a weather-reliant electric system will never be affordable or safe.

[More Reasons to Pause Climate Act Implementation](#)

This is another edition of [reasons why we should pause implementation](#) and reassess the scope and ambition of New York’s decarbonization plans. There are other ways. One of the arguments that my like-minded friends are including in our rate case filings are recommendations for programs that can reduce emissions and save money more effectively than the Climate Act plans.

A continuing theme on this blog is that New York is ignoring the experiences of other jurisdictions with similar net-zero aspirations. [Robert Bryce sums](#) up the Australian net zero scheme as “it won’t work because it can’t work”.

Another personal frustration with all this is that I don’t think that New York can affect global warming because we are only a fraction of the alleged problem. Furthermore, I hold the heretical position that CO2 is not the control knob for climate. That is a fundamental assumption for the necessity of trying to reduce GHG emissions. This post linked to three articles that support my concerns about the “CO2 is the control knob of climate” narrative.

Richard Lindzen and William Happer [have published a white paper](#) that disparages the idea that the reducing GHG emissions will affect the climate rationale for the net-zero transition. These gentlemen are leading experts and have convincing arguments that reducing CO2 will do more harm than good.

If CO2 is not causing the observed recent warming, then what is causing it? In my opinion, it is the sun. Unfortunately, the evidence for a direct recent link is weak. That means that there must be something else affecting the sun’s impact. Something like clouds. I referenced a [recent paper](#) by Tselioudis et al., that argued that there have been measurable changes in cloud cover that are primarily responsible for the observed warming.

Finally, there is another factor at play in attribution science. Dr. Judith Curry debunks the myth of a climate consensus by revealing a profound scientific disagreement on critical issues like the causes and impacts of warming in a [video interview](#). She also notes the part they don’t tell you: “Even if we did achieve net zero by 2050, we wouldn’t notice any change in the climate until well into the 22nd century. So much for claims that we have to do this for our children and grandchildren.