**Pragmatic Environmentalist of New York Summary Update September 8, 2025 -September 21, 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). 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.

**Draft Energy Plan**

The are several Climate Act initiatives currently under review in New York. Most important in my view is the draft State Energy Plan. The New York State Energy Research & Development Authority (NYSERDA) drafted the Draft Energy Plan and is responsible for the stakeholder participation process. I gave an oral comment at the first virtual hearing arguing that the two minute limit on comments shows that NYSERDA is not treating the process as an opportunity to consider stakeholder input. At the Rochester hearing I commented that affordability, reliability, and clean energy acceptability limits need to be defined. I wrote several articles over the last two weeks that describe concerns about the Health Benefits chapter that I am planning to consolidate and submit as a written comment. I have provided background information and a list of previous articles on my Energy Plan page.

My comments at the Draft Energy Plan Virtual Hearing

.This post describes my oral comment at the virtual Draft State Energy Plan Public Hearing on September 13, 2025. The Health Benefits chapter claims $65 billion total benefits between 2025 and 2040 for the Additional Action scenario. However, NYSERDA is using a new modeling approach to project the air quality impacts associated with Climate Act emission reductions that create health benefits.

Air quality modeling is a particular expertise of mine so I plan to submit detailed technical comments. Because the NYSERDA approach is new it must be validated before the projections can be considered credible. Verifying models is not complicated because it only is necessary to compare model results against observed concentrations. Obviously, the observations need to be for the same period as the predictions. Incredibly, the NYSERDA "verification" analysis compared projections for 2025 against observations from 2017 to 2022. In my oral presentation I said:

> That is just plain wrong. The verification statistics presented are worthless. It means that the health benefit claims are unsupportable.

When I described this to one of my friends, he remarked that this is proof that science and NYSERDA cannot be used in the same science. I agree completely.

Asthma and Air Quality Relationships in the Draft Energy Plan

I recently discovered the New York State Asthma Dashboard and realized that I could compare observations from that system with air quality measurements. The crux of the NYSERDA health benefit claim is that various health effects are exacerbated by air pollution. If that is true, then observed inhalable particulate matter ($PM_{2.5}$) should correlate with observed health outcomes.

In this article I compared observations of annual average $PM_{2.5}$ and emergency room visits related to asthma for the New York State for the same locations used in the Health Benefits chapter. I found no consistent relationship between the parameters. While correlation does not necessarily mean causation, lack of correlation conclusively means no causation. Obviously, this has ramifications for the health benefits claims in the Draft Energy Plan.

Draft Energy Plan Health Benefits in Context

In this analysis I compared the interannual variation of annual average $PM_{2.5}$ concentrations and annual number of emergency room visits related to asthma to the Health Benefits chapter projections.

The rationale to reduce fossil-fired emissions because of the relationship between inhalable particulates and asthma is touted in the Draft Energy Plan and is commonly used in other emission reduction proposals. My analysis shows that when the NYSERDA projections are compared to observations, observed interannual variations exceed the projected changes in $PM_{2.5}$ concentrations and number of avoided emergency room visits related to asthma. If the projections are accurate, then the societal benefits claims should also be observed on a year-to-year basis. If those benefits are not observed, then the NYSERDA $PM_{2.5}$ effects on asthma are incorrect. In my opinion it shows the impacts are so small as to have no benefit.

The Public Health Impacts Overview states "The draft analysis shows that implementation of State energy policies would continue to provide substantial public health benefits throughout the State in all communities, with the greatest benefits realized in disadvantaged community areas." In my opinion, NYSERDA has the responsibility to prove that their estimated societal benefits are credible. My written comments will conclude that NYSERDA support of their claim for "substantial public health benefits" is inadequate so the monetary benefit claims are unsupportable.

Assemblyman Phil Palmesano Energy Plan Op-Ed

Assemblyman Phil Palmesano (R,C-Corning) has made oral comments at multiple hearings and has had to deal with the same two-minute limitation as everyone else. He documented all of his concerns in an opinion piece that argues that New York energy policies must ensure energy affordability, reliability, feasibility, safety, choice, and fuel diversity.

He made a good argument that the public is still not aware of the ramifications of the Climate Act. The Draft Energy Plan is an abstract concept. That is going to change because utility bills are going up significantly, policies to "dismantle the affordable and reliable natural gas infrastructure, supply and delivery system" are becoming apparent, and limitations on the vehicles we drive are on the way. "The governor and Democrats in Albany are on mission to fully electrify our state's energy grid with no concern for energy affordability, reliability, feasibility, safety, energy choice or fuel diversity."

He concluded: "It's long past time for Gov. Hochul and Democrats in Albany to finally listen to New York families and businesses when it comes to our state's energy plan and policies instead of virtue signaling for votes."

## My Comments on the NYPA 2025 Draft Strategic Renewable Plan

The New York Power Authority (NYPA) recently published for public comment the draft first update to its inaugural Strategic Plan for "developing new renewable energy generation projects to supply New Yorkers with affordable, reliable, and emissions-free electricity." I described how NYPA was saddled with a renewable development responsibility in an earlier post describing comments submitted by Dennis Higgins. In short, legislation forced NYPA to develop a strategic plan to deploy more renewable energy. This post describes my comments on the draft.

I have been harping on the need to define standards for acceptability limits for affordability and reliability for a long time. My comments argue that the NYPA Draft Plan must develop its own affordability and reliability boundary conditions to ensure that its plans ensure adequate and reliable electric supply consistent with the requirements in Public Service Law (PSL) Section 66-P. Technical staff at NYPA understand the impacts of renewable energy on the electric system whereas the legislators that promulgated the law requiring NYPA to advance renewable energy do not. Establishing constraints based on a comprehensive understanding of the electric system is a commonsense safeguard.

I argued that there have been two things since NY politicians expanded NYPA's renewable energy responsibilities that should be reflected in the 2025 Draft Plan. It has become clear that the costs to implement the Climate Act are significantly more than expected. There was a blackout on the Iberian Peninsula that was associated with solar generation. The Draft Plan should address both.

I think that mixing energy policy and politics is a recipe for disaster. Upset that the deployment of renewable energy was not progressing fast enough to save the planet, the legislation forced NYPA to develop a strategic plan to deploy more renewable energy without any consideration of the consequences. The hubris of the politicians who enabled this legislation knows no bounds. It is not only that their legislation mandates the impossible, but they also hamstring organizations in the state responsible for providing affordable, clean, and reliable electricity.

**Wind Turbine Destruction**

Turbines at the first completed industrial wind facility were taken down recently. The video is interesting. As I noted in a post last January, the wind farm did not live up to expectations. I probably should draft a written comment for the Draft Energy Plan noting that the Pathways Analysis presumed that this facility would still be operating in 2040 and that the assumed capacity factor was greater than what was observed. Readers should keep in mind that renewable energy is more about promises than performance.