Pragmatic Environmentalist of New York Summary Update December 15 – December 28, 2025
This is a summary update of posts at Pragmatic Environmentalist of New York for 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.

Climate Change Perceptions
I often hear and have noticed myself that "winters aren't what they used to be" and that leaves are turning color later than the past. The intent of this article was to explain why this anecdotal "evidence" of climate change is more weather cycles than signs of global warming Armageddon.

Most people have heard of one of these cycles. Before winter starts there are always news stories predicting what the winter will bring. For example, this year: "A La Niña–type precipitation pattern is indicated: wetter than normal for the Pacific Northwest, Great Lakes and much of the northern tier, and drier than normal across the southern U.S., especially the Southwest and southern Plains." The La Niña reference refers to the status of the El Niño/Southern Oscillation (ENSO) oceanic cycle.

What most people don't know is that there are at least 13 other similar oceanic and atmospheric cycles. I based this article on Andy May's analysis of these oscillations from earlier this year. May describes the cycles that have been identified by proxy records of changes in things like tree rings, fish populations, and sea ice. He compared those records with records of global mean surface temperature (GMST) and evaluated the statistical relationships to determine the relative correlation strength.

With respect to the original intent of my article May found that several cycles have been trending upwards at the same time the GMST has been warming. The Atlantic Multidecadal Oscillation (AMO) represents a 60-to-70-year cycle of warming and cooling in North Atlantic sea surface temperatures (SSTs) between the equator and 70°N and has the strongest relationship to global warmng. I believe that the recent observed trend of warming is associated with the warming phase of these natural cycles. We do not fully understand what drives these oscillations and how they affect weather. We do know that they exist and that they have been around as far back as we can see using proxies.

The AMO has the strongest relationship with GMST so I will describe two implications of this cycle. There is indisputable evidence that the AMO has been around since the 1600's. Nonetheless, Climate Act proponents align with some who have argued that the AMO is the result of volcanism and human emissions alone. That argument is based entirely on model output rather than historical evidence. In my opinion, observations should always take precedence over model results. Secondly, these same proponents have acknowledged that the AMO is "unpredictable on time scales longer than a few years" (IPCC, 2021, p. 197). Because the AMO and global warming are closely correlated, that means that they cannot predict global warming on time scales longer than a few years either. Given that the rationale for Climate Act emission reductions is that the model predictions expect increases in global warming due to GHG emissions admitting this means that there is no rationale for the Climate Act.

In my opinion, there is overwhelming evidence that the current warming cycle will eventually reverse without emission reductions. Winters may not be what they used to be now but someday colder weather is inevitable. This does not mean that GHG emissions are not a factor but does mean they are a tweak not the primary driver. This combined with the fact that New York GHG emissions are so small relative to global emissions that we cannot meaningfully affect global emissions means that GHG emission reductions for the sake of the climate is a useless endeavor.

December Reasons to Pause

I frequently note that the Climate Act net-zero mandates will do more harm than good if the future electric system relies only on wind, solar, and energy storage. This post and other similar articles describe reasons to pause implementation and call for amending the law. I believe that there are three general reasons to amend the Climate Act: affordability, reliability, and environmental impacts. This post highlights recent articles in each category that provide additional reasons to pause.

Governor Hochul's letter announcing the approval of the State Energy Plan states: "If any state can show the nation that a clean energy transition can be reliable, affordable, and achievable, it's New York." Gaslighting involves repeatedly denying, distorting, or contradicting what the target knows or observes so that they begin to question their reality and judgment. The Hochul Administration is gaslighting us to cover up the fact that the recently approved State Energy Plan analysis shows the clean energy transition costs are anything but affordable. The analysis of energy affordability with a sensitivity for equipment costs analysis shows that when the levelized costs of the appliances and vehicles necessary to meet the Climate Act household zero-emissions goals are included energy costs increase $593 month for a moderate Upstate household that uses natural gas and has two gasoline vehicles. Insufficient information to calculate similar costs for other household profiles was provided.

Energy Bad Boys Isaac Orr and Mitch Rolling released a report this week entitled *Blue States, High Rates* that Always On Energy Research coauthored with the Institute for Energy Research. You can access the entire report here. It shows that New York's attempts to show the nation that a clean energy transition can be reliable, affordable, and achievable will never succeed.

I do not believe that intermittent, diffuse, and correlated wind and solar will provide a reliable electric system. Rafe Champion recently described the work of Anton Lang, widely known in the Australian energy discourse by his pseudonym "TonyfromOz." For over five years he has updated his weekly series of posts that documents data collection and recording for wind power generation in Australia. His work documents wind droughts that cover the entire Australian National Electric Market (spanning Queensland, New South Wales, Victoria, South Australia, and Tasmania) where output frequently falls to less than 5% of its installed capacity. These conditions are the reason that New York Agencies recognize that a new category of resources are required. I suspect that deploying enough of this capacity to prevent the worst-case blackout will be extremely expensive and will need to use resources with expected lifetimes less than the return period of the worst case. This is a strong reliability case against relying on weather-dependent resources.

Finally, I am convinced that there are unacceptable cumulative environmental impacts associated with the deployment of wind and solar resources necessary to meet the Climate Act targets. I described a Syracuse.Com opinion piece submitted by residents living near the planned Liberty Renewables wind farm in the town of Fenner, Madison County. The project consists of 24 700-foot wind turbines. Their opinion piece explains that when the existing industrial wind turbine complex in their locality was built the residents and town officials had a seat at the table where their concerns were considered and addressed. The town's input has been ignored for the new project. This is but one example of the inane Climate Act deployment policy to build as much as possible, as fast as possible and hope that it all works out. I agree with the writers that this is "immoral, unethical and cruel."

New York State Energy Plan

Most of the articles over the last month addressed the New York State Energy Plan which is a "comprehensive roadmap to build a clean, resilient, and affordable energy system for all New Yorkers". I have provided background information and a list of relevant articles including summaries of recent meetings on my Energy Plan page. The Energy Planning Board rubber stamped the approval of the plan on December 16, 2025. I published two posts describing my last attempt to persuade the Board to consider all the facts and then summarized why I thought the Plan was a failure.

Letter to the State Energy Planning Board

This post describes a letter I sent to the members of the Energy Planning Board that said that it was premature to approve the Plan at this time. I wrote this post to document the fact that Board was told that there were issues before they voted to approve the Energy Plan because someday it will be obvious that approving the plan was a mistake.

In short, the whole process was playacting. The outcome was never in doubt. Despite claims about the value of public engagement and input to inform the development of the State Energy Plan there is no record whether all the input was considered. The bottom line is that the Energy Planning Board was never told anything that negatively reflected on the Administration's narrative that the Energy Plan implementation meeting the Climate Act mandates would be a comprehensive roadmap to "build a clean, resilient, and affordable energy system for all New Yorkers".

Failure of the Energy Plan Stakeholder Process

At the start of the Draft Energy Plan comment period I published an article expressing my fear that this process would replicate the perfunctory treatment of stakeholder comments in the development of the Scoping Plan. All my fears came true.

Nearly 15,000 written comments on the Draft Plan were submitted. A "thematic summary of public comments" was discussed at the November 2025 meeting of the Energy Planning Board. That was the only discussion of comments by the Board. The Board never was told that there were any issues, but on December 16, 2025, the Board summarily approved the State Energy Plan.

In early August I published an article stating that I was worried that the Hochul Administration would just go through the motions of using stakeholder input. My primary concern was the need for a

transparent and comprehensive stakeholder process. I argued that a credible stakeholder process needs two components. The first is interactive meetings but there was never any attempt to engage stakeholders with interaction. The second component of a credible process is a public response to all the substantive comments submitted. Documentation describing specific comments, responses to the issues raised by comments and the recommendation for resolution in the final Energy Plan should have been provided to the Energy Planning Board, the Public Service Commission and the public before the plan was approved. Nothing of the sort was prepared, just access to comments submitted.

The State Energy Plan is too important for it to be a politicized process. The flaws in the stakeholder process of the recently approved Energy Plan prove that the process is undeniably politicized. Selective treatment of stakeholder input does not further the goals of the Hochul Administration to provide a "comprehensive roadmap to build a clean, resilient, and affordable energy system for all New Yorkers".

Observations about the Con Ed Rate Case

Over the last six months I have been working with several colleagues to intervene in New York rate cases to get someone to listen to us regarding the futility of the Climate Act net-zero transition. In our current effort we intervened in the Consolidated Edison of New York (Con Ed) rate case. Francis Menton recently described our latest objection that provides an overview of this effort. This article reproduces Richard Ellenbogen's long and detailed explanation of why the rate case system is broken. Richard Ellenbogen has been speaking to NY State policy makers and regulators since 2019 regarding the deficiencies inherent in NY State Energy policy. I have previously published other articles by Ellenbogen including a summary description of his issues with the Climate Act.

Ellenbogen made several general points. We agree that the rate case system is flawed because no one is stepping up to represent the best interests of the ratepayers even if it conflicts with state policy. There are too many entrenched interests who invest the time and effort to participate only to further their vested interests and not the best interests of rate payers.

Ellenbogen described our objections to the proposed rate case settlement. It boils down to our belief that the Climate Act net-zero transition electrification mandates will inevitably fail due to physics. Coupled with an already stressed electric system, this is a recipe for disaster in New York City. Our position in this case was simple. Don't spend money on unnecessary electrical equipment that won't help the ratepayer during the three-year period covered by this case. We offered several examples of programs that could reduce GHG emissions, save money, and support the electric system but they were ignored.

Ellenbogen provided a detailed analysis supporting our arguments. His bottom line is that the Public Service Commission, Con Ed and the parties to the proceeding are not looking out for the ratepayer. He concluded that:

> Special interests have overlaid an ideology devoid of reality onto the utility system either because they drank the Kool-Aid or they are exploiting those that did to make a buck from it and we are all going to pay for it. The policy is inevitably going to fail but how much damage will be done to the ratepayers in the process?

Best Wishes for a Propserous New Year from the Leatherstocking Line Garden Railroad

Roger Caiazza