Pragmatic Environmentalist of New York Summary Update December 29, 2025 – January 18, 2026

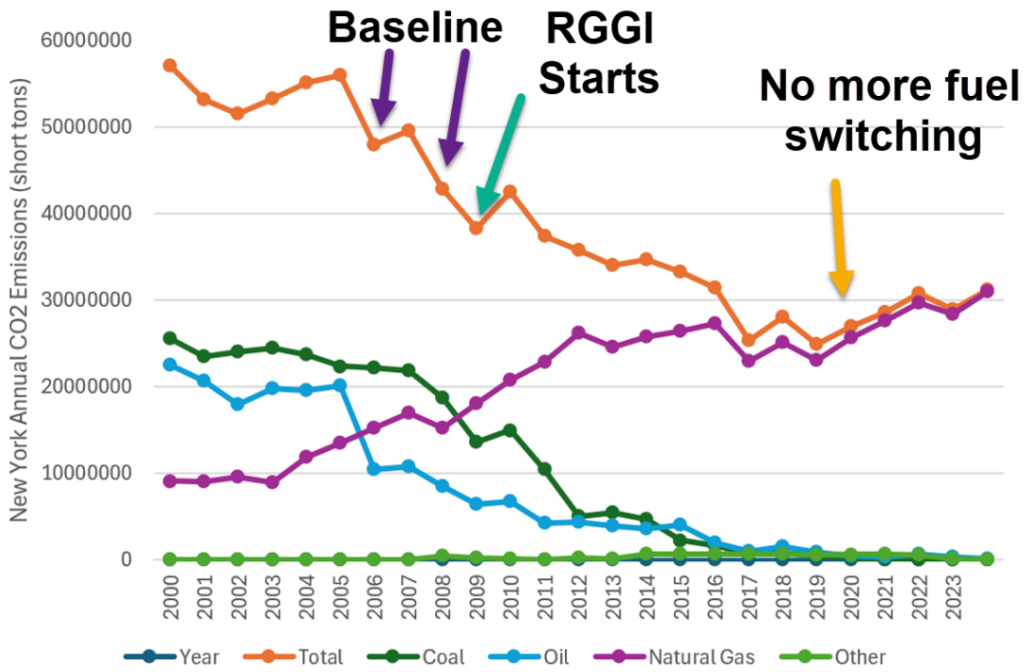
This is a summary update of posts at Pragmatic Environmentalist of New York for the last several weeks. I have been writing about the pragmatic balance of the risks and benefits of environmental initiatives in New York since 2017 with a recent emphasis on New York's Climate Leadership & Community Protection 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.

Regional Greenhouse Gas Initiative

The Regional Greenhouse Gas Initiative (RGGI) is a market-based program to reduce emissions from electric generating units. I published three recent posts related to RGGI.

RGGI Cap-and-Invest Emission Reduction Performance in NY

RGGI is supposed to be a pollution control program. This article updated my annual review how the program has impacted observed emissions. New York State electric generating unit CO2 emissions are down 47% since 2000 Since the start of RGGI in 2009 emissions for units in that program are down 33%. The following figure shows that the reason emissions have dropped is because NY power plants switched from using coal and oil to using natural gas. Natural gas emits less CO2 and was cheaper, so the observed reductions are mostly because of economic fuel switching not RGGI.



There are implications. Fuel switching emission reductions are no longer possible. The only way to reduce RGGI sources is to displace their operations. The RGGI cap on emissions essentially rations energy use so if displacement strategies fail, then there will be rationing. Secondly, proponents of the similar NY Cap and Invest (NYCI) program claim it will work because RGGI worked. RGGI did not reduce emissions so I do not believe NYCI will necessarily reduce emissions either.

Shortcomings of RGGI Caps and GHG Emissions Reporting in the Electric Sector

There are several technical GHG emission reporting and policy issues. Climate Act has unique GHG emission reporting requirements. Consequently, reported GHG emissions for RGGI described in the previous article and the latest New York State (NYS) GHG emission inventory described in a recent post are different. This article compared these emissions.

Almost all of the rest of the world follows the Intergovernmental Panel on Climate Change (IPCC) guidance on emissions reporting and uses the United Nations Framework Convention on Climate Change methodology that uses the "conventional accounting used by other governments, applies a 100-year Global Warming Potential (GWP), omits biogenic CO2, and does not include emissions outside of New York State." RGGI follows conventional accounting practices.

Table 1 compares the Climate Act electric energy sector emissions that use 20-year GWP, includes other GHG gases, and adds non-RGGI stack emissions as well as three additional sources: imported electricity, transmission & distribution, and upstream fuel extraction to the electric sector. There are two columns that compare UNFCCC and Climate Act emissions. In 2023, the UNFCC emissions were 26.1 million metric tons (MMT) and the CLCPA emissions were 49.02 MMT. The table clearly shows that increased emissions were the result of adding CH4 and N2O (0.18 MMT), Electricity T&D (0.12 MMT) and Imported Electricity (9.54 MMT). The table does not explicitly address upstream fuel extraction emissions, but I estimated that they were 13.09 MMT. That is approximately half the direct emissions total.

Table 1: 2023 New York State GHG Energy Sector Emissions (mmtCO2e GWP20), by IPCC Sector with Comparison of CLCPA and UNFCCC Electric Power Sector Emissions

CLCPA Sector	CO2	CH4	N2O	SF6	Total	% of total		UNFCCC Total
Energy	197.35	61.21	1.06	0.12	259.74	73%		159.94
Fuel Combustion	161.17	1.72	0.92	-	163.82	46%		154.39
Electric Power	26.19	0.04	0.04	-	26.28	7%		26.10
Residential	34.13	0.89	0.05	-	35.08	10%		32.18
Commercial	20.78	0.29	0.02	-	21.10	6%		20.49
Industrial	8.36	0.07	0.03	-	8.45	2%		6.63
Transportation	71.71	0.44	0.78	-	72.92	21%		68.99
Fugitive Emissions	0.13	13.25	+	-	13.38	4%		4.55
Electricity T&D	-	-	-	0.12	0.12	+		0.16
Other Use of Fuels	0.84	-	-	-	0.84	+		0.84
Out of State Emissions	35.21	46.24	0.13	-	81.58	23%		-
Imported Electricity	9.50	0.02	0.02	-	9.54	3%		-
Imported Fossil Fuels	25.71	46.23	0.11	-	72.04	20%		-

UNFCCC	CLCPA	
26.10	49.03	Total
26.10	26.28	
	0.12	
		Asssume Out of State is Fuel Extraction
	13.09	Prorated electric power in fuel combustion
	9.54	

This article also compared these emissions to the New York State Energy Plan "official" Pathways Analysis emissions projections for the electric sector. The 2023 observed emissions from RGGI sources was 28.7 MMT. The State Energy Plan projections for 2027 ranged from 49.3 to 40.3 MMT. I do not think it is reasonable to expect that extracting natural gas and oil would produce emissions equal to half the direct emissions. Note that methane (CH4) is the largest component pollutant the Climate Act totals and, given New York's irrational obsession with it, that makes me suspect the emission factors used for methane are biased high.

I also compared these projections with the proposed amendments to the RGGI cap. In 2027 the cap is 19.9 MMT and in 2023 emissions were 26.1 MMT. There is simply no way that New York electric generating units affected by RGGI will be able to achieve the 24% reduction in proposed revisions to the Part 242 RGGI rule by 2027..

My New York State 2026 Operating Plan Amendment Comments

I submitted comments on the 2025 Operating Plan Amendment ("Amendment") for New York's plan to invest RGGI auction proceeds. The crux of my comments is the gap between observed emissions and program limits. To comply with the amended RGGI cap it is necessary for NYSERDA to invest funds that will displace RGGI emissions either directly by deploying generating resources or indirectly by reducing load and generation. If there are insufficient investments, then electric rationing is inevitable.

NYSERDA regularly reports the estimated emission savings from auction proceed investments in status reports. I compared the observed reductions and NYSERDA RGGI investment emission savings and found that the total cumulative annual emission savings through the end of 2023 is only 1,976,101 tons and that represents a reduction of only 4.2% from the pre-RGGI baseline.

Table 2 lists data from the Semi-Annual Status Report through December 2024. It presents "expected quantifiable benefits related to carbon dioxide equivalent (CO_2e) reductions". I did not use "lifetime" savings data because I am trying to compare the RGGI program benefits emission savings reductions to the RGGI compliance metric of an annual emission cap. The observed cost per ton of emissions removed is $583.

Table 2: RGGI Funding Status Report Table 2: Summary of Total Expected Cumulative Annual Program Benefits

Through Date	Cumulative Costs ($ millions)			Savings (Cumulative Annual Tons CO_2e)			Cost Benefit Ratio ($/Ton CO_2e)
	Total Incentives	Associated Costs	Combined Costs	Installed Savings	Pipeline Savings	Total Savings	$ per ton CO_2 savings
12/31/2024	$1,124.6	$170.0	$1,294.6	2,094,817	126,940	2,221,757	$583

I evaluated the potential effectiveness of the proposed funding allocations relative to RGGI compliance support. I categorized each program funded by RGGI whether it would reduce emissions, increase load so it increased emissions, and two other categories that considered programs that do not affect emissions and administrative costs respectively. Programs that could decrease RGGI-affected source emissions account for 53% of investments. Programs that will add load total 20% of the investments. Programs that do not affect emissions are funded with 18% of the proceeds and administrative costs total another 9%.

My primary concern is that RGGI is an electric sector emissions reduction program but proceeds funding does not recognize that. NYSERDA has treated RGGI allowance auction revenues as a convenient slush fund totaling 18% of total funding for whatever politically connected program needs money.

These results show that proponents of the New York Cap and Invest (NYCI) program who expect that it will work because RRGI has been a success are going to be disappointed. NYSERDA investments of auction proceeds only reduced emissions 4.2% and there should be no expectation that NYCI investments will fare much better.

Economic Justification for Installing Rooftop Solar Arrays in Downstate New York

Richard Ellenbogen has a proven record implementing carbon reduction programs at his own manufacturing business in Westchester County. His factory has reduced its electric utility load by 80% while reducing its carbon footprint by 30% – 40% below that of the downstate system. This post describes his recent report: "An Economic Justification for Installing Rooftop Solar Arrays in The Con Ed Service Area - Even Without The Investment Tax Credit" ("Economic Justification").

Based on results from his business Ellenbogen found that "Over a period of 28 years, a 13% annual return on investment is possible in the Con Ed Service Area from installing rooftop solar and if energy costs increase as they have for the past five years, then even higher returns will be likely. "

On one hand rooftop solar proponents could be encouraged that the Economic Justification report demonstrates a strong case for deploying rooftop solar on large Downstate roofs that are not shaded. His recommended system displaces grid energy requirements and does not depend upon net metering for profitability. It does not use solar facilities sprawling over prime farmland or land used by threatened and endangered species. There also is no need for grid support infrastructure. On the other hand, the primary driver of cost effectiveness is what I think are unsustainable electric rates now and increasing in the future. Ellenbogen's concludes: "The models should also be a warning to state policy makers to show how their regulations are driving utility rates to a point where they will be entirely unaffordable within two decades."

Coalition for Safe and Reliable Energy Petition

On January 6, 2026 the Coalition for Safe and Reliable Energy filed a petition with the Public Service Commission (PSC) requesting that "the Commission act expeditiously to hold a hearing pursuant to Public Service Law § 66-p (4) to evaluate whether to temporarily suspend or modify the obligations under the Renewable Energy Program established as part of the Climate Leadership and Community Protection Act." Last August I described a filing and supporting documentation that I prepared with Richard Ellenbogen, Constatine Kontogiannis, and Francis Menton (Independent Intervenors) submitted to the same PSC Proceeding (Case 22-M-0149). Our filing made a similar argument.

The Coalition for Safe and Reliable Energy (Coalition) is "a diverse coalition consisting generally of associations, chambers of commerce and other groups representing various businesses, industries, manufacturers and constituencies from across the state, as well as two members of the state's Climate Action Council". The Coalition lays out the basic argument:

> This Petition seeks Commission action authorized by the CLCPA. Recent evidence suggests that the Renewable Energy Program, and its associated renewable energy targets, may impede the provision of safe and adequate electric service and upset the necessary balance of reliable, economic and sustainable energy in New York State. This evidence justifies commencement of

> the hearing process in PSL § 66-p (4), which will allow the Commission to determine whether the temporary suspension or modification of the Renewable Energy Program obligations is necessary to ensure the continued provision of safe and adequate electric service. Further, the Coalition believes that any hearing held pursuant to PSL § 66-p (4) should examine the relationship between Renewable Energy Program costs and customer arrears.

Their argument is essentially the same as ours. Both filings argue that the PSC should convene a hearing to determine whether it is appropriate to temporarily suspend or modify the obligations of the Climate Act. The Independent Intervenors argued that there was an explicit requirement for the hearing because the customers in arrears threshold has been exceeded. The Coalition makes a persuasive argument that there are sufficient observed threats to reliability that a hearing is necessary to ensure safe and adequate service.

The other difference is that the Independent Intervenors represent the views of four individuals whose credibility lies in our technical expertise. The Coalition consists primarily of associations, chambers of commerce and other groups representing various businesses, industries, manufacturers and constituencies from across the state whose credibility is based on its political and economic clout.

I am encouraged that there is another group making similar arguments that the time has come to convene a hearing to consider an implementation pause. All my attempts have failed but maybe the Coalition will succeed in getting the PSC to convene a hearing.

New York Nuclear Renaissance

Governor Hochul plans to pursue "the most ambitious development of nuclear power in America, setting a new goal to build five gigawatts of new nuclear capacity". I believe that nuclear power is the best option to reduce electric system GHG emissions but there are issues. This post includes Richard Ellenbogen's description of practical deployment issues.

Last November the New York Independent System Operator (NYISO) released its 2025-2034 Comprehensive Reliability Plan (CRP). The report found that "the electric grid is at an inflection point driven by the convergence of three major trends: the rapid growth of large loads, (e.g.: microchip manufacturing and AI-related data centers); the aging generation fleet; and a lack of new dispatchable generation resources being added to the system." Because the generation fleet is retiring more units than are being deployed there is an impending reliability gap. Hochul's announcement did not address those problems which cannot be solved in the time frame necessary by her proposal because it will be too little too late.

The article described the underlying reasons nuclear will be delayed. If new technology is used the design and planning will have to evolve as the plants are built. There are contractor and supply-chain problems with existing infrastructure construction so this will be more of a problem for the new technology. If the deployment goes so far as to mandate that the facilities are "built by and for New Yorkers", then there will be delays because there are insufficient skilled trade workers available today.

In our opinion, nuclear power should be part of New York's electric system's future. However, Hochul's proposal is too little, too late as part of the Climate Act implementation without revising the schedule. It is necessary first to pause implementation and reassess the schedule and ambition of the Act so that it can play a meaningful role without negatively impacting the reliability of the utility system as it is presently doing.

Recommended Reading – Dr. Matthew Wielicki

Dr. Matthew authors the Irrational Fear blog. He frequently writes about issues that I think are important relative to the ultimate need for transitioning off fossil fuels and other aspects of the response to the "climate crisis" that I think are important for everyone to understand. This recommendation to read his work was prompted by several recent articles.

His Climate "Solutions" Are the Real Danger post introduces the risks of plans to counteract global warming directly by modifying the atmosphere to "cool" the planet. He explains that "once fringe, crackpot "solutions" whispered in obscure academic circles are breaking into the mainstream, published in reputable journals and pushed as serious policy ideas." I agree with him that These aren't just bad ideas… they're dangerous, hubristic experiments that could cause real harm, all in the name of fighting a crisis that's more hype than reality."

Wielicki describes another inconvenient truth in his post Greenland's Ancient Melt: The Bombshell Study That Buries Climate Alarmism. He explains that "Greenland has been dramatically warmer in the past… like during the Holocene Thermal Maximum 9,000 to 5,000 years ago, when temperatures were 4–8.5°C higher than today, yet sea levels were lower." This directly contradicts the alarmist cnarrative that modest modern warming will drown the world.

More recently there was another observation that destroys the myth that all observed recent warming is due to anthropogenic GHG emissions. The Hunga Tonga–Hunga Ha'apai Volcanic Eruption injected an unprecedented quantity of water vapor into the stratosphere and was followed by a pronounced surge in global surface temperatures. On one hand it demonstrated that adding GHG emissions cause warming. However, these were uncontestably natural emissions that spiked the observed global temperatures. Wielicki explained how the consensus scientists are trying to discount natural variability to inflate the role of human GHG emissions as the control knob of climate.

In order to fully appreciate his work a paid subscription is a good investment. However, even the free subscription is useful insight into the climate community's biases and inconvenient truths. I recommend going to his blog and subscribing.