

Pragmatic Environmentalist of New York Summary Update February 16, 2026 – March 1, 2026

This is a summary update of posts at [Pragmatic Environmentalist of New York](#) for the last two weeks. The intent of this report is to simply summarize my reports and include links if you want to get into the details. 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.

There is a fundamental [Climate Leadership & Community Protection Act](#) (Climate Act) implementation issue. Clearly there are bounds on what New York State ratepayers can afford and there are limits related to reliability risks for a system reliant on weather-dependent resources. The problem is that there are no criteria for acceptable affordability bounds. I published several related articles about this issue, but the lead article is the most important – the Hochul Administration agrees that something must be done.

[NYSERDA Climate Act Cost Estimate Bombshell](#)

Rebecca Lewis posted two City and State articles that found that the Hochul Administration recognizes that the Climate Act is so expensive that the Governor appears ready to propose changes to the Climate Act to reduce the costly clean energy transition.

In the [first article](#) she explained that state budget director Blake Washington described the cost burdens of the green energy requirements at the Citizens Budget Commission breakfast on 2/25/26. I believe Washington's costs are primarily due to the [New York Cap-and-Invest](#) (NYCI) program. Lewis stated: Blake Washington called the Climate Leadership and Community Protection Act "well-intentioned," but said circumstances had changed since former Gov. Andrew Cuomo signed the law in 2019. "Sometimes you can change governmental rules to just fit the times and actually adapt to the realities, the realities before us, not how we wish them to be," Washington said. He added that the estimated average cost to New Yorkers of the energy transition under current rules comes to roughly \$3,000, a number the governor finds "unacceptable."

In the [second article](#) Lewis described the contents of a NYSERDA [memo](#) from President and CEO of the New York State Energy Research & Development Authority Doreen Harris to Jackie Bray, Director of State Operations. This appears to update some of the numbers that Washington quoted the day before. Lewis notes also that Hochul commented on the cost issues in an unrelated press conference at the same time the memo was released.

Gov. Kathy Hochul suggested on Thursday that the cost of fully complying to the state's climate law could cost average New Yorkers up to \$3,500 each. A new memo shared with City & State from the New York State Energy Research and Development Authority places the estimated cost for upstate gas and oil households even higher.

Lewis quoted the NYSERDA [memo](#):

Absent changes, by 2031, the impact of CLCPA on the price of gasoline could reach or exceed \$2.23/gallon on top of current prices at that time; the cost for a MMBtu of natural gas \$16.96; and comparable increases to other fuels. Upstate oil and natural gas households would see costs in excess of \$4,000 a year and New York City natural gas households could anticipate annual gross costs of \$2,300. Only a portion of these costs could be offset by current policy design.

To sum up, there are estimates of the average New York costs to fully comply with the Climate Act ranging from \$2,300 to in excess of \$4,000 from the Governor, Budget Director, and head of the agency responsible for planning the Climate Act transition plan. In my opinion, all these numbers quoted by Lewis are underestimated.

Using data from the December 2025 State Energy Plan I previously [compared](#) costs to replace existing equipment with conventional equipment relative to the costs to replace with “zero-emissions” equipment for an Upstate New York moderate income household that uses natural gas for heat and has two vehicles. I believe that this difference represents the cost of Climate Act compliance. Table 1 shows that this difference is \$594 a month or about \$7,200 per year. Table documentation is available [here](#).

Table 1: Upstate New York Moderate Income Household That Uses Natural Gas for Heat Projected Monthly Costs and Levelized Equipment Costs Necessary to Comply with the Climate Act

| Row | | 2026 | | 2031 Projection | | | | |
|-----|---|----------------|-------------|-----------------|-------------|---|-----------------|-----------------|
| | | Starting Point | | Starting Point | | Conventional | Moderate | High Efficient |
| | | Base | Sensitivity | Base | Sensitivity | Replacement | Electrification | Electrification |
| 1 | Total Monthly Energy Costs | \$488 | \$ 500 | \$506 | \$ 587 | \$ 361 | \$ 404 | \$ 336 |
| 2 | Natural Gas | \$110 | | \$121 | | \$ 104 | \$ 51 | \$ - |
| 3 | Household Electricity | \$ 96 | | \$101 | | \$ 85 | \$ 195 | \$ 210 |
| 4 | Vehicle Electricity | \$ - | | \$ - | | \$ - | \$ 56 | \$ 109 |
| 5 | Gasoline | \$283 | | \$285 | | \$ 172 | \$ 102 | \$ 16 |
| 6 | Total Monthly Levelized Capital Costs | | | | | \$ 1,013 | \$ 1,446 | \$ 1,632 |
| 7 | Levelized CapEx - Home | | | | | \$ 211 | \$ 530 | \$ 660 |
| 8 | Levelized CapEx - Vehicle | | | | | \$ 802 | \$ 916 | \$ 972 |
| 9 | Total Including Levelized Equipment Costs | \$488 | \$ 500 | \$506 | \$ 587 | \$ 1,374 | \$ 1,850 | \$ 1,968 |
| 10 | Added Cost for Climate Act Compliance | | | | | <i>Difference between conventional and high efficient</i> | | \$ 594 |
| 11 | % Increase for Climate Act Compliance | | | | | | | 43% |

The articles and memo cost estimates are inconsistent with my total estimated cost of \$7,200 per household. In addition, the documentation for just the energy costs are inconsistent with the NYSERDA memo. My costs are by household, and the other average New Yorker numbers may be by person not household so that may explain some of the difference. It is also possible that the memo values are updated from the final Energy Plan.

I have not figured out all the differences but am convinced that the NYSERDA memo values are different primarily because of NYCI costs. A [Perplexity AI query](#) asking about NYCI costs stated that a search of the “entire Energy Affordability Impacts Analysis section of the adopted 2025 Energy Plan confirms zero mentions of cap-and-invest, carbon pricing, allowance costs, or the Clean Air Initiative anywhere in the affordability chapter.” This means that my estimate of Climate Act costs do not include the cap-and-invest costs described in the NYSERDA memo. Therefore, the Upstate natural gas household in the NYSERDA State Energy Plan analysis that included the costs of equipment necessary for Climate Act compliance the updated costs would be the sum of the costs or \$11,200 a year.

[Reasons to Hold a PSL 66-P Hearing – Transmission Needs](#)

On 1/28/26 the Public Service Commission (PSC) [issued a notice](#) soliciting comments [regarding the Coalition for Safe and Reliable Energy petition](#) calling for a hearing consistent with [Public Service Law \(PSL\) Section 66-P\(4\)](#) that establishes safety valves for safe and adequate service. This post summarizes reasons why the current status of the transmission system impedes safe and adequate service.

A grid relying on wind and solar cannot be implemented without significant transmission upgrades. The New York Independent System Operator (NYISO) [has noted](#) that New York’s Climate Act renewable energy projects [depend heavily](#) on transmission because “most new renewable capacity is being built where the wind, sun, and land are available, not where the loads are, and the existing grid cannot move that energy to the major demand centers without large curtailments and reliability problems.”

The NYISO [2025 Power Trends](#) conclusion states that there is a risk that cumulative factors (retirements, electrification, delays) will create reliability metric violations. It is clear from the transmission status described in this post that there will be a lack of sufficient transmission to achieve the Climate Act schedule. This will create reliability metric violations that are incompatible with safe and adequate electric service.

I intend to submit comments on the Coalition petition citing [reasons](#) that the hearing is necessary and the material described will be included. However, given the recent acknowledgement by Governor Hochul that the Climate Act transition costs are “unacceptable” I must ask why it is even necessary to decide whether to hold a hearing. The State should go directly to the hearing.

January 2026 Winter Weather Impacts

I wrote four articles about the impacts of the January 2026 winter weather on the existing and future New York electric system.

[January 23-27 Winter Storm NY Grid Impacts](#)

The first article described two sources of New York Independent System Operator (NYISO) data sets that described the electric system during the last ten days of the month. This is a good case study for a New York extreme event that must be addressed by electric system planners.

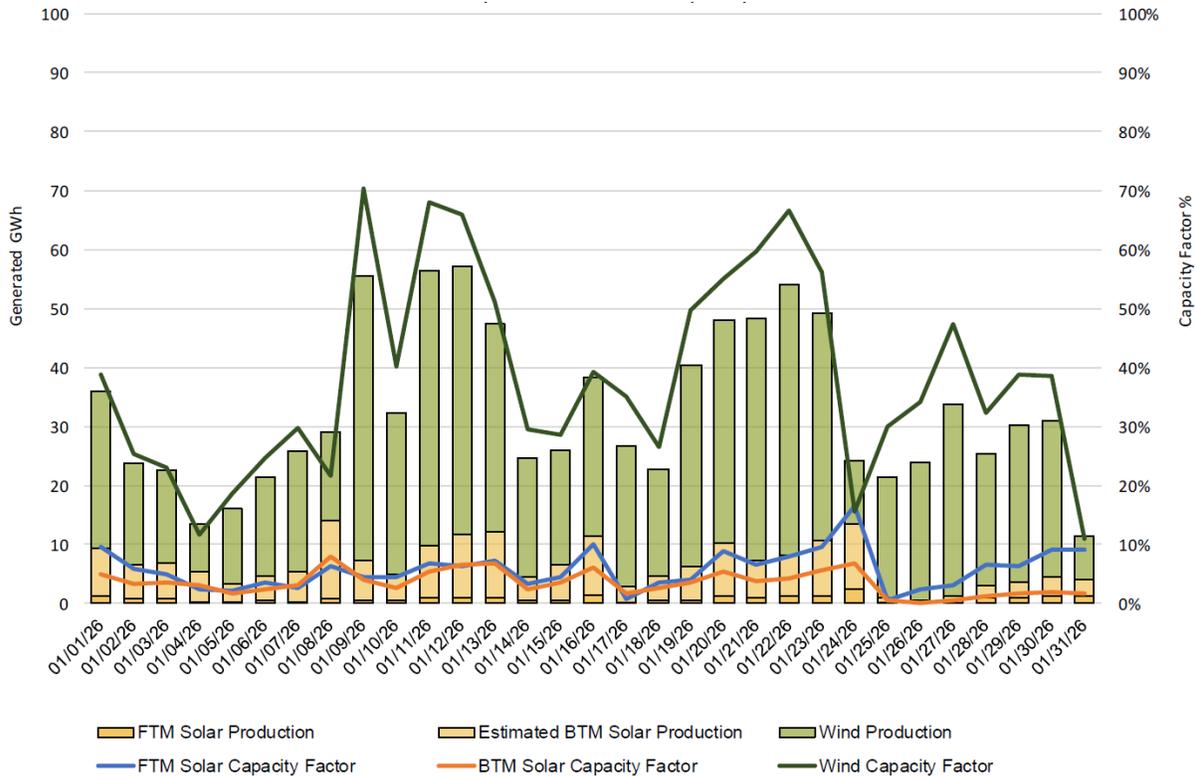
From [January 23 to January 27, 2026](#), a very large and expansive winter storm caused deadly and catastrophic ice, snow, and cold impacts from Northern Mexico across the Southern and Eastern United States and into Canada. In [New York](#) total snow/sleet accumulation ranged from 8-13” near the coast and 12-17” across the interior. As the precipitation ended a glaze of freezing rain occurred. Following the storm there was a period of prolonged sub-freezing weather.

I relied on two sources of New York Independent System Operator (NYISO) data for this analysis. New York fuel-mix load data are available at the NYISO [Real-Time Dashboard](#). The second source of data is the Operations Performance Metrics Monthly Report prepared by the NYISO [Operating Committee](#). I

looked at data from January 22-31, 2026 to examine conditions before the storm and after. Note that the cold weather went into February but the Metrics Report data for February is not available.

The data clearly show that the snowstorm caused both the utility-scale and rooftop solar resources to go to essentially zero on January 25th at the height of the storm (Figure 1). Utility-scale generation came back slowly but had not returned to before storm levels by the end of the month. Rooftop solar never exceeded more than 5% energy availability over the ten days and was only 2% at the end of the month. Clearly rooftop solar got covered with snow and the weather did not allow it to clear off.

Figure 1: Net Wind and Solar Performance Total Daily Production and Capacity Factors



Source: NYISO [January Operations Performance Metrics Monthly Report](#)

These data show that intermittent, diffuse, and correlated electric generating resources are incompatible with electric system reliability because they can be absent when needed most. No amount of additional capacity is going to be able to substantively improve the energy produced because zero times anything is still zero.

[January 23-27 Winter Storm NY Grid Impacts Prove DEFR is Necessary](#) February 17, 2026

A [slightly different version](#) of this article was published at Watts Up With That

The second article explained that the observations from the storm offer electric resource planners an opportunity to examine the impacts of future increased use of renewable energy during high-load conditions. I found that this type of weather event shows dispatchable emissions free resources ([DEFR](#)) are necessary to achieve zero-emissions generation in New York.

I used the data described in the previous post to estimate the daily energy production for NYISO and NYSERDA resource projections in 2040. The goal was to compare the observed daily observed energy load against the projected energy projections to see if the resources provided enough energy to cover the observed generation load during the conditions of the January 2026 storm.

The most notable finding is that there were eight consecutive days when the total New York wind and solar production was 6% or less than maximum possible energy production. This is a perfect example of what the Germans call “[Dunkelflaute](#)”. That term refers to dark doldrums period when solar is reduced due to the length of day or clouds and there are light winds. This event was exacerbated by the snowstorm that covered solar panels with enough snow to eliminate production. It turns out that during these conditions short-term energy storage resources are rapidly depleted and the weather conditions prevent recharging them with wind and solar.

I have no doubt that NYISO staff will eventually evaluate these data in a more refined analysis because of its importance to planning policy. Their results will only differ in degree. They will be able to determine how much DEFR will be needed during this extreme event. Without that resource, intermittent, diffuse, and correlated electric generating resources are not viable.

[South Fork Wind Malinformation](#)

A [slightly different version](#) of this article was published at Watts Up With That.

The third article that relies on the NYISO data addressed Christopher Walsh’s article in the Easthampton Star, [South Fork Wind’s Electricity Generation Proves Reliable](#). It repeats claims from the developer that offshore wind provides reliable energy. Walsh’s article is [malinformation](#) because it is based on fact, but the information presented is used out of context to mislead readers into believing that the South Fork offshore wind facility provided reliable electric generation to the grid during this winter’s extreme period.

Renewable advocates focus on energy production, but power systems are built around reliability during peak demand. If you look at the grid through the lens of accredited capacity, that is, capacity that can be relied upon during peak demand – instead of average energy, the resource allocations for different technologies look radically different. This is the energy vs. power capacity distinction that Walsh ignored.

After describing the facility Walsh states:

Over the course of 2025, South Fork Wind generated electricity on 99 percent of all days and across 90 percent of all hours, according to its developers, the Danish energy company Orsted and the German company Skyborn Renewables. The developers assert that the wind farm generates electricity sufficient to power 70,000 average-size residences.

These claims have the reliability challenge exactly backwards. South Fork Wind did not generate electricity on 1 percent of all days or at least 3 whole days and across 10 percent or 876 of all hours. The problem is that peak loads are commonly associated with high-pressure systems that suppress wind generation. As a result, South Fork Wind was likely unavailable when needed most.

I used the NYISO data to examine January 31 data. The statewide capacity factors were rooftop solar 2%, utility scale solar 9%, and wind 12%. The total daily renewable energy capacity factor was 10% and only provided 2% of the system's daily load. Data from individual facilities are not available but the hourly statewide data indicate that statewide wind capacity was less than 10% for 13 hours including the morning and evening peak loads.

Claiming that South Fork Wind is a reliable source of electricity is based on fact. However, the data on January 31 show that it is not reliable energy. Moreover, offshore wind is the most expensive source of electricity. Continued funding for a resource that cannot provide energy when needed most is a poor investment.

[Virtual Power Plant Misinformation](#)

I also used the January winter storm data to evaluate the potential of Virtual Power Plants (VPP). A recent article in *New York Focus*, [How a More Flexible Grid Could Save New York Billions](#), received widespread New York media coverage. Unfortunately, the claims that VPP can provide reliable power also fall apart under close examination.

Authors Jack Carroll and Colin Kinniburgh describe Virtual Power Plant (VPP) technology:

In a “flexible” grid, powered in part by virtual power plants, homes and businesses take on a new role. Not only can they supply power back to the grid with rooftop solar and batteries, but their devices — smart thermostats and electric vehicles, for example — can communicate with each other and with grid operators to respond to the system's demands.

This article describes errors that invalidate the claims made. In the description of the VPP concept the article claimed that this new approach would be able to retire “an army of power plants, substations, and wires on standby at all times, in preparation for peak times”. I argued that using Richard Kaufman as a source for that quote was a mistake because of his vested financial interests. He did not acknowledge that while the “costs of maintaining that system show up on every energy bill” that is also why ratepayers are assured power is always available. He knows that but is cashing in on by mal-informing New Yorkers.

As an example of VPP, the article described the Orange and Rockland (O&R) Innovative Storage Business Models (ISBM) pilot with Sunrun as a REV Demonstration Project approved by the Public Service Commission. The solar array panel at each home was [designed](#) to provide 110 percent of the annual average and the battery was designed to provide between 8 and 12 hours of essential load for the homeowner. The battery energy more than the homeowner's needs contributes to the 2.1 MW VPP that can provide 4.7 MWh. The VPP pilot could provide 2.1 MW for a little over two hours.

According to a [Perplexity summary](#), the VPP [achieved](#) the following milestones in Summer 2024:

- Enrolled systems: 325 O&R customers contributing approximately 2 MW of aggregated capacity
- Dispatch events (summer 2024): Called on 18 times to provide electricity to the grid during peak demand events

The article based its claim that the VPP technology is a viable reliability solution that offer a cheaper, cleaner way to address load peaks on a [2023 Brattle analysis](#) that claimed networks can “backstop the grid as reliably as an average-sized gas peaker plant, for about half the price.” However, that analysis is irretrievably flawed. I used [Perplexity to review](#) the Brattle Group’s 2023 analysis. The fatal flaw in the Brattle analysis is that the approach used did not address the extreme events that affect peak demand adequately. The analysis focused on individual peak hours/days, not sustained multi-day low-output periods that are associated with peak demand. The problem can be illustrated using observations from the January 2026 winter storm.

I used the same data in the [DEFER is Necessary](#) analysis described earlier to show that this approach impacts both homeowners and the grid negatively. The promise to homeowners is that their battery system will provide essential support during outages. If there is an outage at the same time rooftop solar panels are covered with snow, then there will be no essential support after 12 hours. That is an admittedly a rare event, but when it occurs the homeowner would be desperate for electric power.

There are also problems on the grid level. The [DEFER is Necessary](#) post includes estimates of energy production for different fuel types. VPP technology is supposed to smooth peak loads and eliminate the need for peaker power plants. Oil fired units are used almost exclusively as peaker units in New York. The peak daily oil energy production was 18,252 MWh on 1/26. New York could expand the O&R VPP pilot producing 2.1 MW VPP that can provide 4.7 MWh to a 9,000 MW system that would produce over 20,000 MWh. That would be sufficient for the maximum daily peak. However, looking at the entire episode, I found that such a VPP that relies on distributed rooftop solar would run out of energy on the day after the snowstorm. The sum of the solar resources is not greater than the oil generation for the remainder of the episode. The VPP would have no value to the system after the second day.

The January 2026 storm proves that VPP solar plus storage technology has no value during extended periods of light winds, low solar availability, and snow-covered solar panels. It simply cannot provide necessary power to replace an existing peaking power plant during these periods.

Advocates for VPP claim one of the benefits is that it can replace an army of power plants. However, you can’t shut down the old power plants until you’re sure the new system actually works under all conditions. If it doesn’t, the lights go out, costs rise, and people get hurt. The NY Focus article on VPP misses the fundamental VPP flaw.