

Pragmatic Environmentalist of New York Summary Update March 2, 2026 – March 15, 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.

[Time to Reconsider New York's Climate Act](#)

There is a fundamental Climate Act implementation issue. Clearly there are bounds on what New York State ratepayers can afford and there are reliability risks for a system reliant on weather-dependent resources. The Public Service Commission (PSC) has is authorized to temporarily suspend or modify [New York Public Service Law § 66-p](#) Renewable Energy Program obligations if they impede safe, adequate, and affordable electric service. This post explains how to submit comments demanding that the PSC address this commitment based on several recent events.

On February 26, 2026 the Hochul Administration "[leaked](#)" a New York Energy Research & Development Authority (NYSERDA) [memo](#) that finally quantifies what the Climate Act economy-wide [New York Cap-and-Invest](#) (NYCI) program would mean for everyday energy prices. By 2031, the memo projects that cap-and-invest could add \$2.23 to a gallon of gas on top of whatever motorists are already paying at the pump. It also warns that upstate oil and natural gas households could face gross annual cost increases more than \$4,000, with New York City gas households seeing around \$2,300 more per year. These estimates represent the costs necessary to force emissions cuts fast enough to comply with the Climate Act mandates.

These estimates have engendered claims of climate denial from Democratic Senators (see below) arguing that the costs won't be that high all the while ignoring that the NYCI costs are only for a component of the transition. As I have [shown before](#), for an upstate, moderate-income household that uses natural gas for heat, NYSERDA's energy affordability analysis shows that the levelized costs to replace fossil fuel systems and vehicles with the "zero-emission" equipment required to comply with Climate Act goals adds about \$594 per month or more than \$7,000 per year.

Last January, the Public Service Commission's [notice](#) requested comments on the Coalition for Safe and Reliable Energy's petition to hold a hearing. That step is not routine housekeeping; it is a legal acknowledgment that the Legislature included a safety valve into the statute because it recognized that rigid mandates could collide with grid reliability and affordability. The Coalition—representing businesses and civic groups—argues that current renewable procurement obligations, layered on top of rising costs and reliability concerns flagged by the New York Independent System Operator (NYISO), meet exactly that standard.

Three recent developments paint a consistent picture that should worry anyone who cares about both the environment and ordinary New Yorkers' standard of living. NYSERDA's cap-and-invest memo admits that hitting statutory targets on the current schedule requires fuel price shocks and thousands of dollars per year in added household energy costs. The PSC's notice shows that the state's own regulator is now weighing whether renewable mandates under the Climate Act have crossed the line into threatening safe, adequate, and affordable service—the core mission it cannot ignore. And NYSERDA's Energy Affordability analysis, once you include levelized capital costs, demonstrates that “electrify everything” is not a free lunch but a sustained 40-plus percent increase in monthly costs for a representative upstate family.

If you are concerned about these developments and your rising energy costs, then you can do something. The Commission invited interested stakeholders to submit comments by March 30, 2026, on the Petition filed by the Coalition. Comments can be submitted electronically by going to the [PSC web site](#), and clicking on the “Post Comments” box located at the top of the page.

If you do not want to develop your own comments, then please consider the following that can be copied into the post comment prompt.

I support the Coalition for Safe and Reliable Energy's petition requesting that the Commission hold a hearing pursuant to Public Service Law (PSL) Section 66-p(4) to evaluate whether to temporarily suspend or modify the targets or provisions under the Renewable Energy Program established as part of the Climate Leadership and Community Protection Act (CLCPA).

PSL 66-p(4) provides that the Commission "may temporarily suspend or modify the obligations under such program provided that the commission, after conducting a hearing as provided in section twenty of this chapter, makes a finding that the program impedes the provision of safe and adequate electric service; the program is likely to impair existing obligations and agreements; and/or that there is a significant increase in arrears or service disconnections that the commission determines is related to the program". A PSL 66-p(4) hearing is essential to evaluate whether the Renewable Energy Program, as currently implemented, is compatible with safe, adequate, and affordable electric service.

Safe and adequate service is imperiled by declining reliability margins documented by the New York Independent System Operator. Acceptable reliability risks associated with the Renewable Energy Program have not been defined so the public has no assurance that the declining margins are safe.

Transmission deficiencies threaten reliable delivery. New transmission is needed to get the renewable energy collected to where it is needed. If this transmission is not available, then the energy supply will not be adequate.

The affordability crisis demands a hearing because safe and adequate is only possible if it is affordable. The PSL 66-p(4) hearing must define acceptable affordability metrics that can be tracked.

Multiple independent sources confirm the need for a hearing. State agencies, the Attorney General Office, the NYISO and others have identified schedule and ambition issues associated with the Climate Act implementation that affect the Renewable Energy Program.

The Legislature included Section 66-p(4) precisely to address the situation New York now faces: implementation challenges that threaten reliability and affordability as the aggressive timelines and technology requirements of the Climate Act confront real-world constraints. The Commission has both the authority and the obligation to act.

Please submit comments!

[Calling Questions “Climate Denial” Won’t Keep the Lights On](#)

After the Hochul Administration “[leaked](#)” the NYSERDA memo, a group of 29 New York Democratic state senators responded with a [letter](#) (“Democratic Letter”) to Governor Hochul saying they “categorically oppose any effort to roll back New York’s nation leading climate law” and urging Hochul to “stand strong in the face of misinformation” about affordability. The letter insists that any pushback on the Climate Act amounts to “climate denial” and that only their “bold” agenda will save New Yorkers money, clean the air, and protect a livable climate for our grandchildren. That framing gets the politics right, but the facts are wrong.

The question before New York is not whether climate change exists, but whether the package of mandates in the Climate Act is feasible, affordable, and effective. When it comes to those practical issues, the facts don’t sit well with the people throwing around the “denier” accusation.

Consider costs. When the Climate Act was passed, there was no honest, front-end feasibility and cost analysis. Only after the targets were locked into law did agencies begin publishing scenarios showing the scale of spending required. Those scenarios all assume massive expansion of the electric grid, rapid electrification of heating and transportation, and large-scale deployment of wind, solar, and batteries. None of this comes free. We are already seeing rising bills, growing numbers of people unable to pay their bills, and households struggling with basic energy costs, even before the most aggressive requirements take hold.

The biggest gap in the “bold policy” rhetoric is reliability. A livable climate for our children and grandchildren does not include routine blackouts, shuttered industries, and a grid that fails under stress. Yet the very same politicians who decry “denial” are remarkably casual about the technical challenge of running a winter-peaking system in a cold climate on weather-dependent generation backed by storage that does not yet exist at the necessary scale. Most lawmakers do not understand the electric system and advocate for a [flexible electric grid](#). They don’t understand that the electric system [must be built](#) around reliability during peak demand because that is when it is needed the most. That is why utilities must invest so much in preparation for peak times. While that adds to costs, it is also why ratepayers are assured power is always available. The fact is that maintaining current reliability standards when

diffuse, intermittent, and correlated wind and solar resources are used as mandated by the Climate Act will be incredibly expensive.

Calling anyone who raises these concerns a “denier” is a way of avoiding the hard work of fixing the plan. It flips reality on its head. The truly irresponsible position is to insist that the laws of politics can overrule the laws of physics and economics, and to dismiss the engineers, grid operators, and analysts who point out the contradictions.

[Ellenbogen Response to Democratic Senator Letter to Hochul](#)

Richard Ellenbogen allowed me to publish an article based on his eviscerating the Democratic Letter. His letter documented specific problems with the letter’s claims

He explained that renewables are not cheaper. For example, offshore wind projected costs are double the existing wholesale cost. Wind and solar require enormous amounts of storage that were not considered in the Democratic Letter.

The senators claim that "Fossil Fuel prices" are the root cause of the current price increases but that is belied by the fact that other states are reliant on fossil fuels, and their costs haven't risen nearly as much as those in NYS. Even if renewables avoid fuel price spikes but that is only because the electricity generated from them is so expensive to begin with.

The letter claims that renewables can be deployed quickly but comparison of the renewables needed is relative to the observed deployment. Between 2019 and 2024, NYS installed about 6 GW of solar. At that pace, it would require 50 years (2076 - 26 years after the 2050 deadline) to reach 60 GW except the arrays only have a lifespan of 25 years so more than twice that amount would have to be installed to meet the goals plus replace aging arrays. As a result of that, the state will **never** be able to install enough to meet its needs by 2050 unless it quadruples installation rates but there is not enough labor, material, or money to do that.

As far as the "reliability" claims in their letter, several studies have shown that exceeding 25% - 40% renewables on a system puts the system at extreme risk of encountering stability issues. Ellenbogen described the reliability problems last April in Spain and points out that does not support wind and solar reliability claims.

What the politicians and the environmental movement fail to recognize is that the demand for fossil fuels is [inelastic](#) and that CO2 emissions are inextricably tied to fossil fuel use. Their naïve plans to reduce emissions will inevitably lead to energy rationing if the Legislature does not act to revise the schedule and ambition of the Climate Act.

[Cap and Invest to Meet New Yorker’s Needs Lobbying Document](#)

The February 2026 report [Cap and Invest to Meet New Yorkers' Needs](#), (Needs Report) published by Spring Street Climate Fund and New Yorkers for Clean Air, is the latest in a series of advocacy documents

designed to sell the NYCI program to legislators and the public. This article explains why this article misinforms New Yorkers about the supposed benefits of NYCI.

Last January I [reviewed](#) a [report](#) from Environmental Defense Fund (EDF) and Greenline Insights that claimed New Yorkers will “realize significant economic benefits, including household savings and new job creation, with the Clean Air Initiative” based on an evaluation of all aspects of NYCI. (Clean Air Initiative is a [rebranding](#) of NYCI – it is the same thing.) The Needs Report only addresses the investment benefits.

This is not a serious analysis. It assumes 4% average operational costs. There is an existing cap-and-invest program for the utility industry called the Regional Greenhouse Gas Initiative. A serious analysis would have checked the most recent [RGGI Operating Plan Amendment](#) to determine what the operating costs were for that program. I found that operating costs in the latest budget for RGGI investments was 8% which is twice as much as they assumed. In addition, the organizations behind the Needs Report are advocacy groups with a vested interest in NYCI implementation, not independent analysts.

One of the flaws of the Needs Report is that it ignores opportunity costs when it focuses only on investments. Even a non-economist like me understands that if an analysis does not consider how the money raised by NYCI might have been used elsewhere is not considered, then their economic benefits claims are biased. My [article](#) on the [report](#) from Environmental Defense Fund (EDF) and Greenline Insights included a discussion of this flaw.

One of the alleged benefits of NYCI is that costs will be rebated to consumers. The Needs Report explains that NYCI will dedicate at least 30% of its revenue, the largest slice of the program’s pie, to lowering energy costs for working families. The report claims that “these direct rebates are a central feature of the Clean Air Initiative and stand to lower the skyrocketing cost of living for millions of New Yorkers.” However, the math shows that NYCI makes energy more expensive and only gives back a fraction of the increased costs.

New York [GHG emissions](#) are a fraction of global emissions so nothing we do will affect global warming. There is a fundamental question that the report refuses to answer: if New Yorkers are going to see \$295 billion extracted from their wallets over the next decade, would they be better off keeping that money and spending it according to their own priorities? Until advocates can answer that question honestly, reports like this deserve to be recognized for what they are—lobbying documents, not economic analysis.