

Pragmatic Environmentalist of New York Summary Update March 30 – April 11, 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. Normally there are more articles but the I have been fighting a kidney stone for over a week and my productivity tanked.

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.

My last update noted that there had been developments associated with suggestions to pause the Climate Act led by Governor Hochul but there has been no progress since. Not surprisingly [reactions are mixed](#): the Democrats say the proposed changes go too far while the Republicans say they are not enough. The bottom line is that there has been no leaks of what exactly has been proposed. I published a couple of relevant articles – the first describing the Greenhouse Gas (GHG) emission accounting kerfuffle and the second the malinformation in ads by supporters of Climate Act status quo.

[Climate Act GHG Accounting Controversy](#)

Governor Hochul has proposed changes to the Climate Act that include a [recommendations](#) to “change how emissions are calculated, including eliminating the state’s current 20-year Global Warming Potential metric, which factors in methane and emissions tied to out-of-state fossil fuel extraction.” This is confusing and frequently described incorrectly. In a new Institute for Policy Integrity report, Drs. Raimundo Atal and Al McGartland [examine how this change to the CLCPA’s accounting method](#) would affect New York’s progress toward its climate goals.

Hochul has suggested that New York should use the United Nations Framework Convention on Climate Change (UNFCCC) methodology. Atal and McGartland have done a good job explaining the differences between the Climate Act or CLCPA GHG emissions methodology and the UNFCCC used by most other states and countries. They describe three differences between CLCPA and UNFCCC GHG emissions accounting .

The CLCPA’s accounting approach differs from UNFCCC accounting in three key ways, all of which increase measured emissions at all relevant points in time:

- **Time horizon for Global Warming Potentials:** The CLCPA’s approach uses a 20-year time horizon for calculating Global Warming Potentials (GWPs) when converting non-carbon dioxide gases into CO₂-equivalent (CO₂e) units, which increases methane emissions in CO₂e and thus total emissions compared to the UNFCCC’s standard 100-year time horizon.
- **Out-of-state emissions:** The CLCPA’s approach considers a larger universe of emissions because it includes out-of-state emissions, including emissions from exported waste and

from imported fossil fuels and electricity, while the UNFCCC's approach would exclude these emissions.

- **Net emissions:** The CLCPA's approach calls for gross emissions accounting (at least for most purposes), while the UNFCCC's approach calls for net emissions accounting (incorporating removals from natural sinks such as wetlands and forests).

To give you an idea of the impact of just one of these factors, consider out-of-state emissions. 2025 NYS GHG Emissions Report Sectoral Report #1, Energy Table SR 1.2 2023 Energy Emissions by Gas (mmt CO₂e GWP 20) lists total GHG emissions of 260 mmt and ascribes 61 mmt out of state which is a 31% increase due to the reporting methodology.

While I recommend the report for the clear description of the accounting differences, they are academic economists. There is a glaring disconnect between emission reduction in theory and emission reductions in the real world. Consequently, I do not endorse any of their estimates how changing the accounting will affect compliance economics or schedules. GHG emissions and energy use are inextricably connected and there are limited opportunities for sources that emit GHG emissions to control their emissions. That leaves most sources with two options – switch to less emitting fuels or reduce fuel consumption and energy production. The argument that the relative costs of methane and CO₂ abatement are somehow incorporated into the emission reduction pathway may be true in theory but the presumption that this will evolve into the most cost-effective reduction pathway is unrealistic in practice.

We do agree on one other thing – there is insufficient data to understand the Scoping Plan or Energy Plan:

We conclude that key additional data—specifically, the marginal abatement costs for different gases and sectors—are needed for stakeholders, including policymakers, to properly evaluate the emission reduction pathways under consideration in the 2025 New York State Energy Plan.

This is a useful report because it provides clear descriptions of the differences between the Climate Act and UNFCCC GHG emission reporting methodologies that are currently being discussed by New York policy makers. I am confident that the lawmakers discussing them have no clue about the ramifications of these definitions. I

Finally note that the GHG emission accounting differences are an example of the hypocrisy of the Climate Act authors who purport to “follow the science”. They followed the accepted UNFCCC science except when it was inconvenient to their bias against natural gas. At that point the Climate Act authors went off on their own with absolutely no realization that [the premise of their argument](#) is wrong.

[Spring Street Climate Fund Malinformation](#)

A recent television advertisement by the Spring Street Climate Fund and statements by advocacy organizations are malinformation. Facts are presented selectively or out of context—to mislead the

public and discredit those who are suggesting that changes to the Climate Act interim targets are necessary. This post is a quick rebuttal.

This post addresses the Spring Street Climate Fund [video](#) because it encapsulates most of my problems with the advocacy arguments. The text of the video states:

New York passed the Climate Leadership and Community Protection Act. Landmark legislation moving us to clean, more affordable renewable energy.

Now special interests are trying to kill it, spending nearly \$20 million to protect their profits. All at your expense.

Renewable clean energy means stable costs for ratepayers and less dependence on oil and gas. They know it. That's why they're fighting so hard.

Tell the legislature. Say no to Governor Hochul's roll backs. Protect clean energy now.

I am troubled by these arguments for several reasons. The special interests of the advocates like the Spring Street Climate Fund are ignored. The mantra that renewable energy is clean and more affordable does not stand up to scrutiny. Finally, the reliability of a renewable energy based electric system has not been proven.

[Spring Street Climate Fund](#) is a small Brooklyn-based advocacy outfit that exists to “win scalable climate policy solutions in New York State,” explicitly by running campaigns to pass laws like NY HEAT, enforce Local Law 97, and mandate fossil-free buildings. This ad is [financed by organizations](#) whose business model is to pass more mandates and subsidies and then point to those very policies as “proof” of climate progress and affordability.

The ad asserts that the Climate Act is “moving us to clean, more affordable renewable energy,” with the clear implication that electric bills will go down as wind, solar, storage and building electrification scale up. That framing conflicts with both Climate Act cost analyses and New York's real-world experience with high-renewable policy packages. The response was not to demonstrate how lower system costs have been achieved elsewhere despite the [enormous total cost](#). Instead, they counter-report using modeled “benefits” and rebate flows (cash recycling), which is an accounting exercise that tells you where the money goes, not whether the underlying energy system is cheaper.

The ad further claims that “renewable clean energy means stable costs for ratepayers and less dependence on oil and gas,” suggesting that more solar, wind and electrification will smooth bills and insulate New Yorkers from price spikes. That is a textbook half-truth that [ignores](#) how a high-renewable grid in a cold-climate, winter-peaking state actually works. Advocates are ignoring the fact that Governor Hochul's own climate team is now openly conceding that Climate Act benchmarks (like a 40% emissions reduction by 2030) are [not on track](#) and that some compliance pathways would be “too costly” for New Yorkers. That admission alone contradicts the ad's breezy reference to “stable costs” from renewables, because if the transition were genuinely stabilizing prices, the Governor would not be seeking “rollbacks” in the name of affordability.

The ad accuses unnamed “special interests” of spending nearly \$20 million “to protect their profits,” while presenting Spring Street as the defender of ordinary ratepayers. A quick look at their activities and funders shows that the line between “public interest” and self-interested climate advocacy is far blurrier than the spot suggests. There is an indisputable special interest coalition supporting the renewable energy transition. Policy, NGO, developer, and foundation-funded interests are seeking to expand subsidized climate programs, often with guaranteed cost recovery or contracted revenue backed by ratepayers or taxpayers. The affordability and reliability interests of the public are not a priority with this coalition.

The organizations critical of any changes to the Climate Act have special interests. When any of them complain about “millions” in spending on the other side, they are essentially asking New Yorkers to prefer one set of profit motives over another, under the guise that only its favored policies are in the public interest. Furthermore, those organizations are presenting facts selectively or out of context to discredit the reality that the net-zero transition needs to be [paused](#) to assess what we have learned since 2019 and figure out to fix the flaws in the Climate Act. New York will face a grim future if those special interests maintain their grip on the legislative majority who are the only ones who can fix this mess.

[NYISO 2025 Renewables Summary](#)

This article describes the New York Independent System Operator (NYISO) [summary](#) of the renewable energy covering all of 2025 for the New York Control Area (NYCA). Proponents of renewable energy in New York frequently point to other states and claim that New York should emulate their performance. The fact is that the location and climate of New York are not conducive to wind and solar generating resources. The NYISO summary of 2025 NYCA renewables documents this deficiency well.

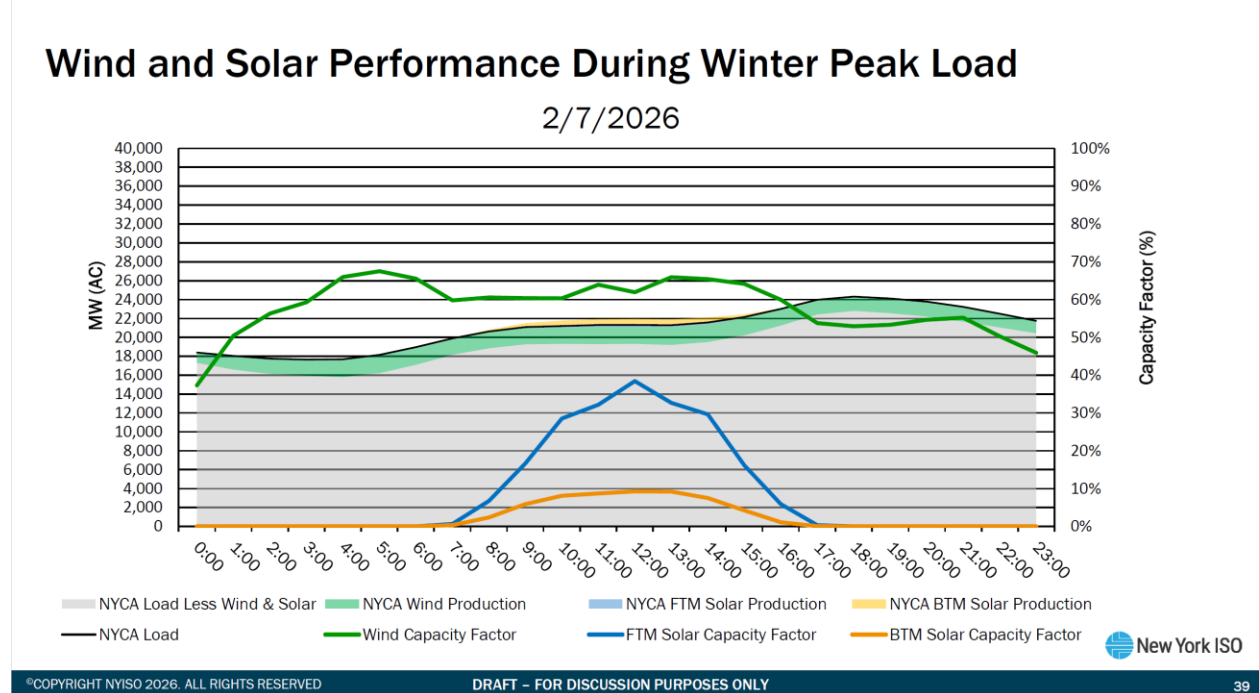
Wind and solar generating resources are intermittent. The standard metric for measuring generating availability is the [capacity factor](#). It is defined as the percentage of the electricity a power plant generates over a period compared to what it could have generated if it ran at full power the entire time. The summary notes that in the last four years the industrial wind turbines had an annual capacity factor ranging from 22% to 28%. Data also show that those wind turbines produced less than 10% of their available capacity a quarter of the time.

How anyone could expect that solar will provide meaningful energy to the New York electric grid has always been a mystery to me living in dreary Upstate New York. The data prove me right. In 2025, NYISO estimates that behind-the-meter (BTM) rooftop solar only provided 13% of the available capacity. Front-of-the-meter (FTM) or utility-scale solar was slightly better at 19%.

The real test for a renewable-based electric system is at projected peak loads. When New York electrifies everything consistent with the Climate Act mandates peak loads will be in the winter. Figure 1 describes wind and solar performance during last winter’s peak load day. It plots the hourly MW load, the load provided by wind, BTM solar, and FTM solar. At best the renewables only provided 10% of the load needed on the system. Proponents of renewable energy talk about “free” wind and solar but

ignore the system costs necessary to back them up when the sun isn't shining, the panels are covered by snow, and wind isn't blowing.

Figure 1: Slide 39 from NYCA Renewables 2025



Source: [NYCA Renewables 2025](#)