

Pragmatic Environmentalist of New York Summary Update September 28 – October 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 summarize my articles 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.

I used [Perplexity](#) AI to generate draft summaries of the descriptions in this document. I asked Perplexity to provide a summary of the following posts and edited the output for consistency and accuracy.

[Independent Intervenors Tell NYPA: Reliability Must Come First in New York's Clean-Energy Transition](#)

I describe the [presentation](#) that Morris Cox, Richard Ellenbogen, Francis Menton, Constantine Kontogiannis, and I made during the New York Power Authority's annual Climate Act conferral process. Our central message was straightforward: existing fossil-fired generation should not retire until replacement resources are operating, deliverable to customers, and proven under difficult conditions.

I distinguish between two separate challenges that energy-policy discussions often confuse. The bulk-power system must provide enough generation and transmission to meet demand. The distribution system must deliver that electricity through local substations, transformers, and circuits. Adequate statewide generating capacity does not guarantee that neighborhood infrastructure can accommodate electric vehicles and heating. Reported voltage problems during recent heat waves demonstrate why actual operating experience deserves more attention.

The biggest unresolved issue is dispatchable emissions-free resources: technologies expected to supply electricity when wind and solar cannot. Assigning this resource category a name does not establish that suitable technologies can be financed, permitted, built, and operated at the necessary scale. Moreover, current technology four-hour or eight-hour batteries cannot independently cover renewable shortages lasting several days. Until this is resolved a renewables dependent electric system is a false solution.

We support nuclear development, but new reactors will not resolve the immediate transition gap. I explain why NYPA should evaluate retaining and repowering necessary dispatchable generation, improving transmission, and developing appropriate hydroelectric, pumped-storage, and renewable opportunities.

Our position is not opposition to emissions reductions or renewable development. It is that every option must demonstrate reliability, affordability, feasibility, and acceptable environmental impacts. Engineering evidence and transparent costs—not statutory deadlines or hoped-for technological breakthroughs—must determine the pace of New York's transition.

[Horseshoe Solar – Unacceptable Solar Project Impacts](#)

I review Janet Glocker's presentation at the [Senate Minority Conference's energy roundtable in Syracuse](#) and explain why I consider Horseshoe Solar another example of unacceptable renewable-project impacts. The 180-megawatt project in Livingston and Monroe counties illustrates how meeting Climate Act targets currently takes precedence over farmland, drinking water, cultural resources, and community interests.

The project converts 552 acres of prime farmland, approximately 15 percent of its project area, exceeding the Department of Agriculture and Markets' 10 percent goal. Although the developer reduced some impacts during permitting, that agricultural guideline remains a goal rather than an enforceable requirement.

The Genesee River crossing is particularly troubling. Drilling breached an aquifer, affected nearby household water supplies, and required repeated corrective work. Months later, regulators requested additional monitoring. I clarify that the crossing serves more than the panels in Rush, but residents still bear substantial risks for limited local generating benefits.

I also distinguish nameplate capacity, average annual output, and dependable capacity. Rush's 8.4 megawatts of panels average roughly 1.5 to 2 megawatts, while their credited reliability contribution is only about 1.2 to 1.3 megawatts.

The subsidy documents contain conflicting totals that I cannot reconcile, but either figure represents substantial assistance relative to three permanent jobs. Archaeological concerns are equally serious: solar arrays received approval with less investigation than the nearby utility substation on similar culturally sensitive land.

My conclusion is that New York needs enforceable siting protections and cumulative-impact assessments. Renewable targets do not justify inadequate safeguards for farmland, groundwater, Indigenous cultural resources, or the communities hosting projects.

[Time to Decide What New York's Energy Future Should Look Like](#)

I describe three reasons New York should pause Climate Act implementation and decide what its future energy system should look like: mineral supply constraints, uncertain electricity imports, and undisclosed electrification costs. These problems reinforce one another, yet the State still lacks a transparent description of the complete system and its cost.

Drawing on [Stu Turley's discussion](#) of declining ore quality and manufacturing bottlenecks, I explain why political deadlines cannot override mineral availability. Wind, solar, storage, and their supporting infrastructure require substantial materials. A system that also needs dependable backup effectively pays for duplicate capacity, even more minerals and adds costs and supply-chain pressures.

[Meredith Angwin's comparison](#) of two Québec transmission projects highlights a different problem. Transmission can move electricity only when generation is available and exporters are willing to supply it. Québec's winter priorities and the Champlain Hudson Power Express's outages and limited deliveries demonstrate why contracted imports should not be confused with guaranteed assistance. Regional heat

waves and cold spells can stress New York and its neighbors simultaneously. Ultimately, New York must not rely on imports to meet expected loads.

[Matt Jacobson's discussion](#) of Maine electrification makes the affordability issue concrete. Greater electricity consumption requires more generating and delivery infrastructure, while subsidies shift costs rather than eliminate them. Maine and New York have gone down similar paths but neither has disclosed household impacts and full-system costs before implementing transition policies.

I also note that the Public Service Commission has not established meaningful tests for the [Public Service Law 66-P](#) statutory safety valve. My recommendation is to pause the transition, establish acceptability criteria for the safety valve, compare alternatives using dependable electricity per dollar of total system cost, assess import risks realistically, and show ratepayers the arithmetic.

[Hochul's Energy Infrastructure Development Plan: Rhetoric, not a Plan](#)

I evaluate Governor Hochul's Energy Infrastructure Development Plan against the reliability-first, affordability-driven planning approach I have advocated with the Independent Intervenors in the NYPA Conferral Process. The announcement correctly recognizes that rising demand and disconnected planning processes require better coordination. However, it promises a process rather than demonstrating how New York will maintain dependable, affordable electricity.

I support considering generation, storage, transmission, and demand-side resources together. I also welcome recognition that manufacturing, electrification, and data centers change the planning challenge. But promises to keep the lights on and control costs mean little without measurable standards, explicit resource requirements, and transparent customer-bill estimates.

The most important omission is dependable generation. The announcement does not address the large quantity of dispatchable emissions-free resources that planners expect to need, identify deployment milestones, or establish contingency actions if those technologies fail to arrive. Nuclear deserves serious consideration, while repowering and new natural gas generation may be necessary to bridge the transition.

Timing is another concern. An interim plan in 2027 and a comprehensive plan in December 2029 do not match problems already evident during stressed operating conditions. Decisions about generation retention, fuel infrastructure, and replacement capacity cannot wait.

I outline what a credible interim plan should include: realistic load forecasts, seasonal and locational capacity requirements, demonstrated replacements before retirements, full-system costs, large-load cost allocation, siting safeguards, and independent scrutiny of assumptions.

Ultimately, integrated planning will not overcome statutory and regulatory constraints by itself. I argue that reliability must take precedence, affordability must govern spending, and the State must reconsider rules that prevent timely deployment of dependable resources.

My concerns are echoed by Richard Ellenbogen in his guest post.

[Energy Infrastructure Development Plan: The Chickens Are Coming Home to Roost](#)

I reproduce Richard Ellenbogen's response to New York's Energy Infrastructure Development Plan and include Doreen Harris's announcement that the Energy Planning Board will begin the process on December 9. Ellenbogen and I agree that the announcement gives little indication that the State will confront the underlying problems with its existing policies.

Ellenbogen argues that New York's reliability concerns are consequences of pursuing renewable targets while discouraging or retiring dependable generation. Adding another planning process will not correct those problems unless the State changes its resource assumptions and priorities.

His central concern is whether the materials, equipment, and labor needed for the proposed system will actually be available. Recent discussions of transformer shortages, rising grid-equipment costs, declining copper ore quality, and skilled-worker shortages reinforce warnings he previously submitted to the Public Service Commission.

He compares equally sized solar, wind, natural gas, and nuclear facilities to illustrate differences in land requirements and annual electricity production. His argument is that geographically dispersed, lower-output resources require much more infrastructure per unit of electricity delivered. Renewable development also needs supporting equipment for grid stability and substantial storage during extended periods of low production.

Ellenbogen estimates that providing equivalent functionality through storage could require trillions of dollars, an expense the State has not explained how it would fund. I reiterate the point we both have made many times before that the State has not provided a transparent documented cost estimate of total life-cycle system costs. Without that information no one knows the actual expected costs.

The broader point is that affordability claims must account for physical resource requirements and dependable output. A plan that doubles down on existing assumptions risks higher costs without solving New York's generation shortfall.