Pragmatic Environmentalist of New York Summary Update October 12-October 25, 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.

The Regional Greenhouse Gas Initiative (RGGI) is a market-based program to reduce greenhouse gas emissions (GHG) (Factsheet) from electric generating units in the NE. Proponents have been touting the benefits of the cap-and-invest program all the while ignoring its problems and costs. I have been writing about RGGI a lot lately because New York State is making claims and plans based on a policy program that I think is failing.

Updated NY Residential Cost Impact of RGGI

I updated my estimate of the Regional Greenhouse Gas Initiative's residential electricity costs using new information from Potomac Economics, complete 2025 data, and September's allowance auction. The results reinforce my concern that Governor Hochul's affordability messaging conflicts with the policies her administration supports.

RGGI requires fossil-fueled generators to purchase allowances for their carbon dioxide emissions. Those costs enter their electricity bids. When an affected generator sets the wholesale clearing price, other accepted generators receive the higher price too. Consequently, auction revenue alone does not measure what consumers pay.

The market monitor's report helped me revise assumptions about which generators set prices and how frequently RGGI affects them. My revised approach recognizes seasonal differences and assigns no RGGI cost during hours when unaffected resources set prices. These remain estimates. The only way to correctly estimate costs requires confidential hourly market data only available from the New York Independent System Operator (NYISO)

At September's $37.65 allowance price, I estimate annual costs of $91 to $125 for a typical residential customer, compared with a central estimate of $23 in 2021. My central statewide estimate at that price is approximately $1.7 billion annually.

I also question whether investment benefits justify these costs. My review attributes only about 4.7 percent of observed New York power-sector emissions reductions to RGGI-funded investments.

I recommend an independent, transparent accounting of wholesale impacts, verified customer savings, and emissions reductions. If benefits do not justify costs, New York should consider fundamental restructuring or withdrawal from RGGI.

New Jersey's RGGI Leakage Warning Applies to New York Too

Testimony at a New Jersey regulatory hearing warned that high RGGI allowance prices disadvantage efficient local power plants against generators in states outside the program. This is emissions leakage: reductions inside the regulated region can be offset by increases elsewhere. New York faces the same problem through electricity imports.

I based my article on a NJBIA description of the hearing under a blunt headline: "How RGGI Now Incentivizes Dirtier Air in NJ." Alpha Generation testified that RGGI costs cause its cleaner New Jersey plants to run less while higher-emitting upwind plants run more. Independent modeling supports that mechanism. My calculations using New York's regulatory modeling indicate that outside emissions offset 72 to 76 percent of modeled RGGI-region reductions in two policy cases.

I developed estimates for non-RGGI electricity serving New York in 2024 and 2025, filling a gap in monitoring reports. My central estimate rises from about 9.5 million tons of carbon dioxide in 2024 to 10.5 million in 2025, despite declining electricity volumes from those sources.

These figures do not prove RGGI caused the increase. Reduced hydropower availability and greater reliance on PJM imports explain much of the change. That distinction matters: evidence of dirtier imports is not itself proof of policy-driven leakage. Nevertheless, higher allowance prices strengthen the competitive disadvantage. Upwind coal generation also creates conventional pollutants that can reach New York.

I recommend updated leakage analysis at current and projected allowance prices, timely monitoring, and transparent import emissions factors. Regulators should evaluate regional outcomes, not simply in-state reductions.

What Blakeman Could Do and What Hochul Did to New York Utility Costs

I responded to a New York Focus fact check of Bruce Blakeman's promise to halve electricity bills on his first day as governor. I agree that the promise is a slogan, not a credible plan. However, the fact check overlooks important policy choices affecting electricity costs and reliability.

Eliminating clean-energy surcharges alone would not cut bills in half. The larger question is how state policies affect wholesale prices, transmission spending, generation investment, and fuel availability. I estimate that RGGI costs consumers $1.7 billion annually when wholesale market effects are included, substantially more than auction proceeds alone suggest.

Governor Hochul inherited the Climate Act but owns its implementation. Her administration supported tighter RGGI limits as allowance prices more than quadrupled, advanced costly transition requirements,

and postponed rather than abandoned an economy-wide cap and invest program similar to RGGI. Changes to statewide emissions targets left the electric-sector mandates intact.

I outline actions a governor could initiate through appointments and agency direction: pursue RGGI withdrawal or negotiate a firm allowance-price ceiling; establish objective criteria for the Climate Act's affordability and reliability safety valve; and build an electricity plan around the grid operator's identified needs.

I also recommend supporting additional natural gas pipeline capacity and strategically locating new or repowered generation. Replacing older equipment can improve air quality while strengthening reliability. Note that since I published this article, the head of NYISO made it clear that Gov. Kathy Hochul's administration will have to play a role in addressing projected reliability problems.

These measures would not halve bills overnight. They would address policy-driven costs and urgent reliability risks.

Grid of the Future Rate Petition

I reviewed a petition asking the Public Service Commission to lower electric delivery rates for households using heat pumps or electric resistance heating. The petitioners estimate these customers collectively overpay about $740 million annually because current rates recover fixed delivery costs through electricity consumption. I agree that customers should pay rates reflecting the costs they impose, and that renters with electric resistance heat deserve particular attention.

However, changing rates does not reduce the cost of maintaining the delivery system. Lower bills for electric heating customers mean higher bills for other customers unless actual system savings offset the difference. The petition does not adequately explain those impacts.

More importantly, its argument depends on spare winter capacity that widespread electrification would eliminate. New York is expected to become a winter-peaking system by the mid-2030s. During prolonged extreme cold, heating demand rises while heat pump efficiency declines and wind and solar generation can be limited. Batteries and thermostat adjustments cannot supply energy throughout a multiday shortage.

I recommend full disclosure of impacts on other customers, automatic reconsideration as winter demand approaches the seasonal peak, and separate consideration of electric resistance heating customers. Electrification incentives should also depend on findings that dependable resources will be available.

My overriding concern is sequencing: New York should determine how to serve rapidly growing winter demand reliably and affordably before adopting special rates intended to accelerate that demand.

Shepherd's Run Solar Permit Denied

One of the highlights of the past two weeks was the denial of Hecate Energy's 42-megawatt Shepherd's Run solar project in Copake. Unlike the earlier application, dismissed after the developer lost control of necessary land, this application failed on its merits. The decision exposes weaknesses in New York's renewable siting process.

The Office of Renewable Energy Siting and Electric Transmission denied the permit (decision and press release) on two independent grounds: inadequate evidence of compliance with Copake's floodplain law and an incomplete accounting of wetlands. The floodplain requirements implement the federal flood insurance program and cannot be waived by the state siting office.

As a meteorologist, I found the hydrology assessnebt particularly troubling. Hecate used a design rainfall of 5.29 inches rather than the NOAA value of 7.96 inches without explaining the difference. Its wetlands information also relied on older fieldwork and failed to address protections for wetlands of unusual importance.

The outcome required persistent opposition, expert testimony, intervention by the Department of Environmental Conservation, and administrative judges willing to recommend denial. Siting staff continued recommending approval even after the hearing. I doubt most communities could afford comparable scrutiny.

Hecate previously blamed opposition on disinformation, including concerns about watershed impacts. Those concerns proved central to the denial. Meanwhile, the conversion of productive farmland remains inadequately addressed.

I welcome the outcome, but environmental protection should not depend on a town's resources. Enforceable siting standards should protect wetlands, farmland, and host communities from the outset.

New Yorkers for Clean Power Testimony Ignores the Costs

I reviewed New Yorkers for Clean Power's legislative testimony (video) from last year because it captures the arguments advocates use to claim that Climate Act implementation will improve affordability. I respond to six themes: affordability, health benefits, the causes of high bills, program funding, building electrification, and distributed solar.

My objection is the lack of a verifiable accounting. New York has never established objective affordability criteria for the Climate Act's statutory safety valve. Meanwhile, more than 1.3 million households were at least 60 days behind on energy bills in December 2025, owing over $1.8 billion.

I question whether projected health benefits are supported by observed relationships between improving air quality and asthma emergency visits. I also dispute the claim that fossil fuels alone explain unaffordability. Climate-related policy charges, RGGI compliance costs, and policies discouraging replacement generation contribute to the problem.

Renewing the billion-dollar Sustainable Future Program does not establish that its spending will produce cost-effective emissions reductions. A declining emissions cap likewise cannot create alternatives that are not available.

The target for two million electrified or electric-ready homes is inconsistent with installation rates and state projections. Heat pumps can suit some households, but subsidies shift costs rather than eliminate them.

Finally, free sunshine does not mean free electricity: storage, backup, and grid support must be counted. Before expanding these programs, I recommend published total costs, defined affordability thresholds, and verified emissions reductions per dollar spent.

Oswego's Big Machine

I used a New York Energy Alliance Facebook post about the Oswego Harbor Power Plant to explain why this rarely operated facility remains valuable and to correct misconceptions in the comments. My perspective reflects decades supporting the plant's air permitting and emissions reporting, including ten years with an office there.

The authors correctly explained that Oswego's two oil-fired units provide dependable generation when demand is high or other resources are unavailable. Their low output does not mean they lack value. Capacity payments compensate the owners for keeping that backup available.

I also challenged claims in the comments that the facility explains local respiratory illnesses and lung cancer. My experience with dispersion modeling and surrounding monitoring showed compliance with National Ambient Air Quality Standards. County health statistics do not establish that this plant caused reported health problems. Comparing 2000–2005 with 2020–2025, nitrogen oxide emissions declined about 89 percent and sulfur dioxide emissions about 94 percent.

The broader issue is whether proposed replacements can provide equivalent service. Batteries store electricity rather than produce it, and additional transmission cannot guarantee neighboring regions have surplus power during widespread shortages. Oswego supplied energy during the extended January–February 2026 cold spell that would require enormous battery investments.

I commend the Alliance for highlighting this underappreciated resource. Before dismissing existing plants as obsolete, New York should demonstrate that replacements can supply electricity when and where needed at an affordable cost.