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New York State Energy Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

President Doreen Harris:

Thank you for the opportunity to submit comments on the draft of the 2025 New York Energy Plan (Draft Plan).

RPA is an independent, non-profit regional planning organization that works to improve the prosperity, infrastructure, sustainability and quality of life of the New York-New Jersey-Connecticut metropolitan region. Since 1929, RPA has produced four comprehensive long-term plans to direct the growth, development, and sustainability of our region. The ideas and recommendations from these plans have shaped the region's infrastructure, open spaces, and economic development projects for the past century.

Building on this legacy, RPA strongly supports Governor Hochul's directive to create a forward-thinking New York Energy Plan, particularly at a time when state climate action has never been more important.

Introduction

In 2019, New York enacted the landmark Climate Leadership and Community Protection Act (CLCPA) to herald New York State into a climate friendly energy system. The CLCPA sets out to reduce New York's economy-wide greenhouse gas emissions by 40% by 2030 and 85% by 2050, with a zero-emission electricity system by 2040. Benchmarks of the CLCPA include 70% renewable generation by 2030, 9 GW of offshore wind by 2035, 6 GW of energy storage by 2030, and 10 GW of solar by 2030. 35-40% of the benefits of clean energy investments must be directed towards disadvantaged communities, as stated in the CLCPA. While the 2025 solar benchmark has been met, it is likely that other benchmarks will be missed, in part due to federal policy and COVID-19 related supply chain disruptions that have affected every sector of the economy. In light of these disruptions, it is prudent New York lays out a comprehensive plan for all sectors of the economy to reach the legally mandated 85% by 2050 reduction of greenhouse gas emissions. RPA applauds New York for creating this plan and offers suggestions on a chapter-by-chapter basis.

Electricity

Offshore Wind

Federal opposition and ongoing supply chain issues will make it very difficult for the state to meet its current goal of developing 9,000 MW of offshore wind energy generation by 2035.

The Energy Plan should take the following actions to ensure that New York is offshore wind-ready for when the pause is lifted, and new projects can come forward for solicitation.

Continue to support Empire Wind and Sunrise Wind

One of the best ways to meet our clean energy goals is to continue to build and support an offshore wind future. As we have seen with South Fork Wind, offshore wind is reliable, efficient, safe, and necessary for New York's energy system. It puts people to work and delivers energy at a known and set rate. The state must continue to support Empire Wind and Sunrise Wind and lay the groundwork for future projects by supporting transmission infrastructure today. The state should also work closely with communities and offshore wind developers to produce a clear pathway for recommitment to offshore wind goals, project solicitations, and improved procurement and implementation processes, upon the lifting of federal obstacles. There may not be any new solicitations for offshore wind under the current federal administration, but the state can and should position New York to be offshore wind ready so that new projects can be built and plugged in the moment the federal fog of uncertainty lifts.

Review and adapt future goals and solicitations

Due to the aforementioned delays, the state must analyze and amend the current offshore wind goals to reflect the current conditions, capacity, and timelines of future projects to provide more certainty to the industry, while maintaining ambition. The state should evaluate and update the solicitation process and the corresponding Offshore Renewable Energy Certificates (ORECs) to learn from previous challenges and increase the chance of success. This will allow the state to better predict and plan for realistic project costs which will greatly facilitate future development.

Future-Proof Offshore Wind and Other Grid Infrastructure

As extreme weather events become more frequent, temperatures rise, and sea levels increase, it is imperative that transmission infrastructure be built with the future in mind. The Energy Plan should direct the PSC to work with local utilities and NYISO to modernize their equipment and make it more resilient to an unpredictable future. This includes supporting workforce development for the trade workers who will build and maintain this critical infrastructure in the future and maintaining and growing partnerships with unions such as IBEW.

Continue current and future transmission and port planning and investments

Despite recent setbacks nationally and in New York, the offshore wind industry is not going away and is actively employing hundreds of workers in the state. New York should take every step it can to ensure that the state is offshore wind-ready, investing in port infrastructure, and preparing the grid for offshore wind connections so that when the time is right, there will be a seamless transition.

One of the most important steps towards this is to re-designate the Public Policy Transmission Need (PPTN) for New York City, allowing a clear pathway for transmission infrastructure to be built in time for new offshore wind projects. The state should continue with the Article VII review process for the Queensboro Renewable Express and work to approve this critical project. NYSEERDA and ESD should also fight for the Arthur Kill Terminal and attempt to get the cancelled federal funding back. The Arthur Kill Terminal will employ hundreds of New Yorkers and provide income for local Staten Island Businesses. The state should continue to support the South Brooklyn Marine Terminal and the Renewable Ravenswood Plan.

Increase community engagement and promote community benefits

While federal obstacles will prevent advancing on any new offshore wind projects for the next four years, the state should use this opportunity to clarify community concerns and build support for offshore wind and transmission through increased community engagement, facilitating collaboration between communities and developers. Communication is key to getting renewable energy projects built, and the state should continue its work communicating with host communities and New York State residents about ongoing plans and construction of transmission infrastructure, as well as creating public forums for comments and engaging with community and industry leaders. Listening to communities and building relationships between potential host communities and developers can help ensure that all forms of community benefits can be realized in the future.

Solar

Continue to advance solar and explore opportunities for large-scale solar

New York State has established itself as a leader in the development of solar energy, particularly at the local level. The State has successfully reached its initial 6 GW goal of installed solar capacity a full year ahead of schedule, with around 2,300 MW developed for LMI communities via the Value Stack program. New York is making great progress with installed solar capacity and should build on the success of the program and continue investments and other support for advancing the solar transition, especially supporting the Solar for All program. The State and local municipalities should continue to collaborate with grassroots organizations to develop long term plans for how land and rooftops could be used to host solar arrays.

Implement Automated Permitting for Residential Solar and Storage

While the state has made enormous strides in residential solar installations, homeowners still face numerous barriers and bureaucratic processes to rooftop solar and storage installations. Advancing legislation in requiring the establishment of an automated permitting platform for municipal governments specifically for residential solar and storage, such as S5781A introduced in early 2025, will help New York meet and exceed the state's solar generation goals and provide cost savings to residents throughout the state.

Remain committed to equity goals to develop solar in LMI and disadvantaged communities

New York State has developed many beneficial tools to make solar power accessible to LMI and disadvantaged communities, with programs like NY-Sun and Statewide Solar for All incorporating critical targets for LMIs/DACs to build solar capacity. Given that surplus NY-Sun funds have been dedicated to build an additional 500MW of solar power for LMI communities, in addition to the 1,600 MW LMI/DAC target, following the completion of the updated 10 GW of distributed solar by 2030 goal, it is imperative that New York State work to meet this extended goal in a timely manner so that capacity can be increased for low income and disadvantaged communities and the \$600M worth of investments can be distributed accordingly.

Energy Storage

Advance Utility-Scale Energy Storage to Pair with Offshore Wind and Other Renewables

Incorporating bulk energy storage into the grid as more renewable resources come online will be essential for reliability, stability, and efficiency. In particular, pairing storage with offshore wind will help to ensure that New York can effectively transition away from fossil, and other non-renewable fuels, and achieve a better and more just climate future. DPS and NYSERDA's 2024 Energy Storage Roadmap importantly lays out a strategy for procuring utility scale storage projects to meet the state's updated goal of 6 GW of storage by 2030 capacity. We commend the state for including the benefits of offshore wind and solar energy storage pairing as a cost and time efficient avenue for developing storage. We urge the State to prioritize Tier 1 and offshore wind proposals in the first bulk energy storage request for proposals.

The Energy Plan should also support legislation that incentivizes grid scale energy storage, such as S05506 introduced in early 2025, to ensure large scale energy storage systems that are necessary for offshore wind and grid reliability are built. The Plan should also include a framework for a public education campaign demystifying the facts and fiction around energy storage.

Build a Modern, Sustainable and Resilient Grid

The region's electrical grid has not kept pace with advances in energy technology and will require greater investment and coordination among energy providers and regulators across the three states to meet rising demand and become a lower-emitting, reliable, and flexible system. As the state shifts toward clean energy, new transmission lines and substations will need to be built to connect this clean energy to the people and industry in New York. This calls for a once in a generation upgrade to our energy system that advances projects like Propel NY, and others like it, to ensure a reliable, resilient system going forward.

Plan for a more electrified, renewable region

As New York's population, and the region around it, continues to grow, vehicles and buildings become more electrified, and large loads from data centers and AI infrastructure grow, more electricity will be needed. New and updated grid infrastructure is a necessity to meet the expected demand that will occur from the aforementioned factors. That includes building new and upgrading old transmission and distribution lines and substations, as well as implementing grid enhancing technologies on existing infrastructure and building energy storage systems to manage load. All of this must be planned for with adequate time for engagement and moving through the permitting processes to bring projects online in time.

Adapt the grid for the greater variability of new renewable power generation

The future grid will need to be more flexible, with the ability to store power, distributed with local generation and able to facilitate communication between supplier and user. Energy storage is essential for more variable renewable power generation, especially to balance demand in times of high energy use. New York is only at roughly 7 percent of its goal of 6,000 MW of energy storage by 2030 and should expand efforts to build energy storage systems throughout the state.

Additionally, we encourage the state to remain engaged in the Northeast States Collaborative on Interregional Transmission to map the way forward across state and grid management boundaries. Increased interregional transmission is key for delivering offshore wind and other renewable energy sources throughout the northeast and will reduce long term costs as energy demand rises.

Prepare the grid for a generational growth of demand

In the few years, the country has seen a generational growth of electricity demand, spurred mostly by data centers powering AI processes. New York has the potential to be a new hub for data centers, much like Northern Virginia, and must prepare the electricity system for a significant growth in demand. The Energy Plan should consider innovative suggestions to mitigate the projected demand growth such as requiring data centers to build or procure their own clean generation sources or allowing the grid operator to curtail their demand during peak demand.

Nuclear

As the state continues to develop its Master Plan for Responsible Advanced Nuclear Development and considers the prospect of long term nuclear, we recommend the Governor, NYSERDA, and the New York Power Authority strenuously review existing studies of the feasibility of nuclear, including the 2024 NYSERDA blueprint, and determine if there is a responsible financial, environmental, and community-supported path forward for new nuclear power in the state. Furthermore, the state should carefully consider the safety and potential impacts of nuclear investments as it undergoes potential renewal of the Zero Emission Credit program. The state should be fully transparent in its findings and ensure that New Yorkers are robustly engaged and understand the costs and benefits of a more nuclear New York. Finally, the state should ensure that private developers, not consumers, bear the financial risks associated with any new nuclear facility.

Natural Gas and Petroleum Fuels

Responsibly ramp down fossil-fuel power and heat

New York has made significant progress in its effort to ramp down fossil-fuel power, with the closure of the Somerset Generating Station in 2020. The state should continue to work closely with utility companies and other stakeholders to clearly chart a path to phase out the remainder of fossil fuel-powered plants in a way that ensures reliability and fair rates. Such a vision should consider how the region moves away from existing power plants, over what time period and if there is a point at which the state will no longer approve new fossil fuel plants or infrastructure. Working closely with community and environmental justice advocates will ensure that communities that have disproportionately borne the burden of polluting energy infrastructure can gain the most from these shifts.

New York is driving the transition away from fossil fuel combustion in buildings for space and water heating through its all-electric new construction mandate, rigorous building codes and cutting-edge programs that demonstrate the efficacy of clean, electric heat in a variety of building typologies and help New Yorkers reduce overall energy consumption. The state can do much more to expedite this transition by expanding programs like EmPower+ and launching the cap-and-invest program.

Any new fossil fuel infrastructure must align with New York's affordability, reliability, environmental and climate goals

New York must proactively orchestrate an orderly transition away from fossil fuels by ensuring that utility shareholders bear the risk of speculative investments, withholding approval of investment in assets that are likely to become stranded before the end of their useful lives, and eliminating earnings opportunities for the replacement of distribution pipe when not required for safety or when lower cost measures are as or more effective.

Maintaining the reliability of the gas system is an imperative, but many weather-related and other threats to the system are beyond New York's control. The best thing that the state can do to protect New Yorkers from those threats is to reduce our dependence on that system, not approve investments that dramatically increase our reliance on it. Similarly, there is little New York can do to control the volatility of the price of gas, which is a global commodity. The best thing that the state can do to protect New Yorkers from high heating costs, which are a result of that volatility, is to expedite the transition away from gas to clean electric heat powered by New York State renewable electricity.

Avoid conflict with environmental justice goals

New York has been a leader in environmental and climate justice, particularly with their commitment of 35-40% of investments in clean energy going towards DACs. Fossil fuel infrastructure, including natural gas power plants and pipelines, most significantly affects DACs, causing higher rates of asthma and cancer in those communities and pollutes waterways and agricultural fields.

If New York decides to permit fossil fuel infrastructure, then the state must prioritize mitigating the effects that infrastructure has on environmental and climate justice communities. This includes investments into those communities and environmental clean-up programs to remediate long term fossil fuel and industrial pollution affecting those communities.

Climate Change, Adaptation, and Resilience

Climate change and related hazards like extreme heat, disaster events, and flooding pose a threat to the state's existing and planned energy infrastructure. Compounded with aging infrastructure and the growing demand to build new projects, climate impacts pose a multi-hazard threat to New York's energy system. We commend the state in recognizing the importance of incorporating climate resilience into new and existing energy and grid assets to address multiple climate and non-climate induced hazards. We also recognize that initiatives like the Extreme Heat Action Plan and the New York Community Risk and Resiliency Act allow the state to responsibly plan and prepare for climate change.

We urge NYSERDA and its state partners to carefully consider the impact of project siting on disadvantaged communities and the environment while also siting carefully as to avoid coastal and inland flood zones. All energy infrastructure must also be hardened and redundant in order to avoid disruptions from climate events. Furthermore, the 2022 legislation signed by the Governor requiring major utility corporations to develop Climate Change Vulnerability Studies and Climate Change Resilience Plans should be expanded to include all utility providers.

Energy Security Planning and Emergency Preparedness

We commend New York State for having comprehensive, multi-energy emergency preparedness plans and energy security planning. In a time of increasing energy demand and more frequent extreme weather events, it is imperative for all levels of government to have contingency plans in place for when the next climate disaster strikes or when energy supply dips below demand. We recommend that the state, along with the NYISO, continue to work with other states in our region and factor in their energy resource adequacy - as New York imports a percentage of their energy supply, it is important to understand the resource adequacy of those who we may depend on in times of emergency. We also recommend that the state continue to educate local governments and the general public about emergency preparedness and energy security planning. A well-informed public makes implementation of emergency and energy security plans go much more smoothly.

Buildings

New York's varied and diverse building mix plays a significant role in the transition to a zero emissions electric system by 2040.

Increase funding for EmPower+

EmPower+, the state's premier program for improving energy affordability, has helped thousands of low and moderate-income New Yorkers save money through retrofits to their homes. Expanding this program and increasing funding can lower energy costs for households across the state and reduce energy consumption through energy efficiency improvements, such as heat pumps, insulation, and wiring upgrades.

Support building owners transition to clean buildings

The Energy Plan should include efforts to improve energy affordability while transitioning away from fossil fuels in buildings for both new construction and retrofits, including facilitating bulk procurement of clean heating equipment, providing access to low and no-cost financing and facilitating direct install services.

Align utility regulation with the CLCPA.

New York should eliminate subsidies for gas line extensions (the 100' rule), replace the utility "obligation to serve" *gas* with an obligation to serve *heat*, and set specific emissions limits for gas utilities that align with CLCPA mandates.

We support the environmental justice considerations in making this transition to clean and renewable electricity, like the PSC's Energy Affordability Policy which will prevent LMI households from paying more than 6% of their income on utility bills.

As a step towards graduating from the large reliance on fossil fuels for powering the state's buildings, we commend the new developments within the New York State Fire Prevention and Building Code Council which has mandated, statewide starting in 2026, for buildings seven stories or less and commercial and industrial buildings up to 100,000 square feet to be all electric. We urge the state to seriously consider an expansion to these parameters and to stress the importance of clean electrification and the availability of incentive programs to building owners and developers.

Transportation

Transportation accounts for 40% of final energy use in New York and is one of the largest contributors of greenhouse gases (GHG) and other air pollutants in the state, accounting for 43% of total fuel combustion GHG emissions in 2022. In alignment with NYSDOT's Statewide Draft Transportation Master Plan, the Draft Plan lays out a vision for a cleaner and more equitable transportation system, but recommendations must be strengthened to make the transportation system as clean, resilient, and efficient as possible and to make it more convenient for residents to get out of their cars more often. In general, specific and measurable goals should be included with each recommendation in order to improve the clarity of the Energy Plan and the accountability of the state.

Strengthen and Align Land Use Planning with Transportation Planning and EV Infrastructure Planning

As the Draft Plan notes, fuel economy improvements and greater adoption of ZEVs reduce the energy demand of individual vehicles. However, in order to avoid offsetting those reductions with increased driving overall, we must concurrently reduce the distance New Yorkers travel by car, measured in vehicle miles traveled (VMT). In certain areas of the state, land is being developed faster than population is growing. This outsized development necessitates new transportation infrastructure, and the cost to build and maintain roads puts stress on already limited transportation funding which could otherwise be directed towards strategies to reduce energy usage and emissions, such as investing in ZEV adoption and alternative transportation modes such as active transportation which does not contribute to energy demand or GHG emissions.

The Smart Growth chapter of the Draft Plan notes that compact development patterns “significantly reduce transportation-related energy use and make communities more livable, resilient, healthy, and equitable.” RPA supports New York State's recommendations to prioritize and coordinate investments in location-efficient areas to enable compact development, support local governments' Smart Growth development, and encourage interagency coordination to expand and encourage more active transportation and public transportation use. The Energy Plan should go further to ensure these recommendations are implemented by providing guidance on specific and measurable goals for adoption and by leveraging the state's ability to coordinate regional efforts to reduce VMT and transportation energy use. The Energy Plan should also provide guidance to align Smart Growth, transit, active transportation, and micromobility planning with EV infrastructure planning to avoid duplicative efforts or redundancy.

The Energy Plan should recommend avoiding highway expansion or widening due to the energy demands of construction and maintenance of transportation infrastructure projects as well as the phenomenon of induced demand, where new road capacity is quickly used up by more cars, leading to additional road infrastructure in a vicious cycle which only reinforces auto dependence. The Draft Plan notes that expanding roadways to keep up with land development growth or address congestion is often not fiscally viable or desirable, especially since unnecessary expansion of roadways and sprawl result in compounding maintenance costs that take away from already limited transportation funding. To support the goals of the Energy Plan, the state should say no to widening highways, including in the cases of the NYS Route 17 Mobility and Access Improvements Project and the Cross Bronx Bridges Project. The Cross Bronx Bridges Project provides an opportunity to fix bridges and enhance safety without expanding infrastructure footprints.

The Energy Plan should promote the use of alternative transportation modes as a demand management strategy. The Draft Plan's discussion of traffic delay and safety impacts of congestion,

lists Traffic Incident Management (TIM), Emergency Management Systems, and Traffic Signal Optimization as strategies to reduce demand but does not include transit or active transportation in the discussion. It is mentioned elsewhere in the plan that transit and active transportation reduce congestion, but existing recommendations for expanding transit, active transportation, and micromobility would be strengthened by encouraging the transition away from cars as a strategy for reducing congestion, as well as avoiding instances of induced demand.

The state should continue to coordinate regionally to support the continued success of New York City's Congestion Pricing program. Transit ridership has increased considerably since the Congestion Pricing program went into effect, which supports state energy goals by encouraging and funding more efficient forms of transportation. In the future, the state should research whether the Congestion Pricing model could be applied in smaller metros as well.

Critical Juncture to Support ZEV Infrastructure with Managed Charging and Battery Storage

The share of new vehicle sales that are zero-emission vehicles (ZEVs) is projected to grow in New York due to shifting consumer preferences, increased supply from manufacturers required to increase ZEV sales, and hopefully the success of strategies intended to make ZEVs more economically viable. The 2022 Advanced Clean Cars 2 rule aims for 100% of light-duty sales to be ZEVs by 2035. This growth in ZEV sales will result in an increase in overall and peak electrical use, and in order to meet this growing demand and reduce costs for drivers and ratepayers, New York will need to increase grid capacity while implementing strategies to smooth and balance demand. These strategies should include managed charging, which may reduce the cost of EV charging and the demands on the electric grid by more than 25%. While the Draft Plan calls for the Public Service Commission (PSC) and utilities to continue to refine load management and managed charging, recommendations should more aggressively support these strategies and address barriers to meeting increased energy demand in the following ways.

PSC should evaluate whether current incentive programs for managed charging, offered in accordance with the CLCPA, can be improved enough to meet needs for off-peak charging, or whether additional managed charging programs are required. Participation in programs to incentivize residential and commercial station users and owners to charge during off-peak times has been mixed so far and must improve.

PSC and utilities should plan to support active managed charging programs, where utilities remotely control EV charging rates, now while the grid is being modernized and upgraded. *Passive* managed charging, where EV owners charge during low-cost periods, is valuable but may create new spikes in electricity demand when low-cost charging times begin.

The state should build on-site battery energy storage systems (BESS) as necessary to manage demand from new Direct-current Fast-Charging (DCFC) stations which the Draft Plan currently recommends along busy travel corridors. BESS can reduce demand during peak times, which is important as DCFC stations do not have high potential for managed charging due to the fact that users want to charge quickly during on-peak hours rather than waiting until off-peak hours. DCFC stations can manage their charging through technologies like on-site BESS, which can charge at off-peak times and reduce electricity demand during peak times.

Smart Growth

RPA commends the acknowledgement of and recommendations on the relationship between urban design, building typologies, land use, and energy consumption. These findings are aligned with RPA research and recommendations to promote smart growth practices.

Economic Development, Industry, and Agriculture

The Rural Electrification Act brought electricity to parts of America that had never been touched by power before, revolutionizing agriculture and industry, growing new cities and population centers. Now, rural America is experiencing another revolution - one brought by clean energy. New York can and should take advantage of this revolution - building out clean energy infrastructure, including transmission infrastructure, in rural areas, electrifying industry, creating an in-state clean energy supply chain, fostering research and development, and building a stable workforce in clean energy and clean industry.

There are several ways New York can remain competitive and stand out against other states in attracting industry and development, many of which have been well laid out by the state in this chapter. To add on to those recommendations, the DPS and NYSEERDA should look at the example set by the New Jersey Board of Public Utilities and create a new set of grid modernization rules intended to streamline the process of studying, siting, permitting, and building clean energy infrastructure.

As RPA has previously laid out in our [Ports of Opportunity](#) report, it is critical that New York build and support a clean energy supply chain through the state. New York must support and extend ports and projects such as the South Brooklyn Marine Terminal, Arthur Kill Terminal, the Port of Albany, and the Port of Coeymans that are critical for clean energy infrastructure, both onshore and offshore.

A robust clean energy supply chain is needed to meet the needs of large energy users. With an in-state supply chain, critical infrastructure can be built faster, using in-state mostly union labor, providing dual benefits of economic development and infrastructure development.

Agriculture can also benefit from this revolution. The state should work with farmers and landowners on building on-site energy generation such as wind and solar, both for use for agricultural processes and powering neighboring communities.

While industry should adopt carbon capture and storage, we must emphasize that this is not a silver-bullet solution. Carbon capture and storage, while still necessary, only deflects a small percentage of greenhouse gas emissions. It must not be used as a way to avoid reducing emissions, but rather as a tool to remove *existing* emissions.

Relatedly, New York must move forward with the NYCI program by draft regulations. While the Draft Plan recognizes the substantial benefits of Cap-and-Invest, it recommends only continued exploration, thereby failing to incorporate a key element of the Scoping Plan. The extensive preparation that NYSEERDA and DEC have undertaken for the launch of Cap-and-Invest is unprecedented. The exploration is complete. The Energy Plan should propose moving forward with the program's proven market-based tools to reduce carbon emissions while generating funds for disadvantaged communities. The NYCI program will also lead to lower energy bills by committing to local clean energy instead of out of state producers and generate billions of dollars for our transit system and energy infrastructure, critical pieces in fighting climate change.

Clean Energy Jobs and a Just Transition

New York has one of the most robust energy workforces in the country, with over 318,000 workers employed in the sector - of that, more than half of those in a mature and steadily growing clean energy workforce. The state expects that number to grow by 13% by 2040. To ensure the industry continues to grow and provide opportunities for those left behind by the shrinking fossil fuel industry, it is imperative to continue workforce development. The Energy Plan should lay out a framework to work with energy sector unions as well as academic institutions, local governments, and energy developers to create comprehensive workforce development, recruitment, and transition plans. A skilled and ready workforce is necessary to take our energy system into the 21st century.

Energy Innovation

In order to meet the state's climate goals, it is imperative to continue to innovate and test new energy technologies, grid enhancing technologies, and energy efficiency measures. The Energy Plan should lay out a framework to create an ecosystem where new technologies that can improve the reliability of our energy system and decrease greenhouse gas emissions can be safely tested and implemented in our grid.

At the same time, it is important to continue to support existing and proven technologies, such as offshore wind and solar. These are reliable, safe, and cost-effective energy systems that are already in place, and can only be improved upon.

Local, Regional, and Federal Government Collaboration

With waning federal support for all state programs, and outright opposition towards climate and clean energy goals, New York should focus on strengthening collaboration with local communities and other states in the region. Local and state collaboration is key to building clean energy infrastructure and providing support to communities who want to decarbonize or support their DACs through state infrastructure spending. Regional collaboration is particularly important for transmission planning, as well as defending clean energy projects from federal overreach.

The state should also work with local governments and neighboring states to improve permitting and siting processes to streamline the implementation of clean energy infrastructure.

Conclusion

RPA appreciates the opportunity to provide comments on the Draft 2025 Energy Plan. We are encouraged to see this critical work advance and look forward to continued engagement as the state moves toward a more equitable, resilient, and decarbonized energy future. We welcome the chance to collaborate further to help ensure the plan delivers on its full potential for all New Yorkers.

Thank you,

Robert Freudenberg
Vice President, Energy & Environment
Regional Plan Association