



**NORTHEAST REGIONAL OFFICE**

48 WALL STREET, 15TH FLOOR

NEW YORK, NY 10005-2903

T: 212.845.7376

F: 212.918.1556

*Via Email*

July 2, 2025

Rory M. Christian  
Chair and Chief Executive Officer  
New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

Amanda Lefton  
Commissioner  
New York State Department of  
Environmental Conservation  
625 Broadway  
Albany, New York 12233-0001

The Honorable Kathy Hochul  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224

Doreen Harris  
President  
New York State Research and  
Development Authority  
17 Columbia Circle  
Albany, NY 12203

**Re: Correcting Misleading Conclusions from the NYISO June 2, 2025 *Power Trends* Summary**

Dear Governor Hochul, Commissioner Lefton, Chairman Christian, and President Harris:

On June 2, 2025, New York Independent System Operator (“NYISO”) issued its annual summary *Power Trends* report. Earthjustice and Environmental Defense Fund write to correct misleading implications in the report and press release. The report’s messaging—that additional fossil fuel electricity generation is needed for reliability—is not supported by NYISO’s own analysis, and the report should not be used to derail New York’s progress toward a clean energy future. In fact, NYISO’s policies favoring fossil fuel generation and its delays in interconnecting clean energy resources to the grid are the real threats to reliability, and New York should prioritize the buildout of renewable energy and storage, and transmission, to comply with state law and protect New Yorkers’ wallets and health.

The *Power Trends* report is not based on new information or analysis but is rather a summary of prior NYISO reports and analysis, none of which found that fossil-fired generation is necessary for reliability or that repowering aging power plants is beneficial for New York or the grid. NYISO’s technical analyses on reliability that are the basis of this report do not support the implication in *Power Trends* that immediate investment in additional gas resources is necessary to maintain reliability. Instead, it seems that NYISO is irresponsibly seeking to create a false narrative that New York needs new gas generation, even though there is no evidence to support that claim.

In fact, NYISO itself questions the reliability of gas-fired electricity generation to meet future winter demand peaks. The *Power Trends* report states that “[a]s these fossil-fuel

generators age, they are experiencing more frequent and longer outages.”<sup>1</sup> Many gas plants have retired in the state over recent years because they are not being utilized and are uneconomic. In addition, Winter Storm Elliott in 2022 exposed serious risks tied to overreliance on fossil fueled generators, particularly gas generators, where freezing and fuel issues resulted in generators failing to deliver power during extreme cold. In response, NYISO is no longer assuming certain gas generators will be available during winter demand peaks. According to the report, the only shortfall in electricity supply that NYISO anticipates would be due to gas supplies freezing during the winter. NYISO’s suggestion to deepen reliance on burning gas in this situation is internally inconsistent and dangerous for New Yorkers.

Nor has NYISO specifically identified any new reliability need. NYISO acknowledges in *Power Trends* that a previously identified reliability need “no longer exists at present.”<sup>2</sup> It also states that “[c]urrent statewide reliability margins in winter are sufficient”<sup>3</sup> and that peak demand in 2024 was at a 20-year low in NYISO. While *Power Trends* notes new large loads may affect reliability, many recent reports have noted the uncertainty of those speculative new loads. The NY Public Service Commission has also acknowledged that the scale and timing of additional large industrial loads is uncertain. Building out new gas generation in anticipation of uncertain loads that may never materialize would be unwise and costly to New Yorkers.

In sum, the new conclusions and messaging in *Power Trends* are not supported by the evidence and perpetuate the false narrative that more gas is needed or is less costly. In fact, just last week, as part of a stakeholder meeting on transmission, NYISO stated that a public policy requirement identified by the Public Service Commission—adding transmission facilities to deliver approximately 4,770 MW of offshore wind to New York City—will result in savings on electricity production costs of up to \$40–70 billion starting in 2033.<sup>4</sup> And that is incremental to the benefits of the Propel NY transmission project that will help deliver offshore wind to Long Island. Neither the clean energy and transmission reliability benefits nor the cost savings are mentioned in the press materials accompanying *Power Trends* report that focus so much on gas.

The answer is not more health-harming and pocketbook-impacting methane gas pollution—New York has plenty of clean energy ready to be deployed that can more than meet any future needs. Affordable clean energy and storage projects are ready to be built but are facing barriers created by NYISO. Clean energy and storage are undervalued in the capacity markets by NYISO rules, and due to NYISO delays in interconnection, are waiting an average of 6–7 years to connect to the grid. There are approximately **50,000 MW** of mostly clean energy projects stuck in the interconnection queue,<sup>5</sup> which if given a fair shake, could be built faster and cheaper than new gas.

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<sup>1</sup> NYISO, *Power Trends 2025* at 13 (June, 2, 2025) [hereinafter 2025 *Power Trends*], <https://www.nyiso.com/documents/20142/2223020/2025-Power-Trends.pdf/51517a1b-36fa-4f3d-d44d-eabe23598514?t=1748873879190&source=email>.

<sup>2</sup> *Id.* at 22.

<sup>3</sup> *Id.* at 11.

<sup>4</sup> NYISO, NYC PPTN Update 4, 29 (June 25, 2025), [https://www.nyiso.com/documents/20142/52151333/NYCPPTN\\_ESPWG\\_2025\\_06\\_25.pdf/8e6b16fb-534a-c5d5-2614-9671fada1f4f](https://www.nyiso.com/documents/20142/52151333/NYCPPTN_ESPWG_2025_06_25.pdf/8e6b16fb-534a-c5d5-2614-9671fada1f4f).

<sup>5</sup> 2025 *Power Trends*, *supra* note 1, at 26.

We are deeply concerned that NYISO has repeatedly failed to take actions to strengthen New York’s grid and connect new clean energy and storage, undermining the state’s Climate Leadership and Community Protection Act (“CLCPA”) compliance by, for example:

- Failing to meaningfully speed up the interconnection of new clean energy and storage projects, despite reform efforts;
- Exempting itself from the surplus interconnection rules that would unlock additional capacity on the grid; and
- Undervaluing renewable energy and storage in its capacity markets and via its rules.

NYISO’s failure to prepare New York’s grid for a clean energy future inhibits climate progress, fails to prioritize affordability, and harms New Yorkers’ health and pocketbooks. We urge you to critically evaluate NYISO’s statements and history of inaction in the wake of the misleading NYISO *Power Trends* summary report and press release and to consider next steps to reduce these obstacles.

Thank you for your commitment to the critical climate, health, and justice protections enacted in the CLCPA that protect all New Yorkers. We look forward to working with you to navigate and eliminate the obstacles to compliance with the statutory mandates therein.

Respectfully Submitted,

Rachel Spector  
Mandy DeRoche  
Elizabeth Moran  
Earthjustice  
48 Wall St., 15th Fl.  
New York, NY 10005  
[rspector@earthjustice.org](mailto:rspector@earthjustice.org)

Ted Kelly  
Michael Zimmerman  
Environmental Defense Fund  
555 12<sup>th</sup> St. NW #400  
Washington, DC 20004  
[tekelly@edf.org](mailto:tekelly@edf.org)

cc (via email): Members of the New York State Legislature