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THE SENATE  
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ALBANY



**SENATOR TODD KAMINSKY**  
9th SENATE DISTRICT

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February 2, 2022

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

Dear Secretary Phillips:

I am proud to support the proposed contract between the New York State Energy Research and Development Authority (NYSERDA) and Clean Path New York (CPNY), which will allow CPNY to deliver renewable power to New York City.

As sponsor of the Climate Leadership and Community Protection Act, I made a commitment to reduce the state's dependence on fossil fuels. Now, more than ever, it is imperative that we discontinue the natural gas combustion that has backfilled for Indian Point since its closure. Currently fossil fuel plants provide approximately 85% of the city's electricity.

New York City has also enacted legislation that will mandate the use of renewable power in the coming decade. Both the City's Local Law 97 and the statewide CLCPA require dramatic and immediate reductions in harmful greenhouse gas emissions. In addition, the State and City have concluded that additional downstate transmission is the key to meeting these goals. I support CPNY, which will reduce the State's emissions from electric generation by 22% by 2030, a significant step in achieving the 70% by 2030 target.

CPNY will generate 3,800 MW of clean electricity, enough electricity to power more than two million homes. Although CPNY is just one of many projects that will be needed to meet our CLCPA targets, I believe that its 2027 expected in-service date should be a near-term priority for New York State.

In addition to the environmental benefits, CPNY will create thousands of green jobs and will invest \$1.8 billion in New York communities. Finally, the CPNY project has committed \$270M to a community benefits fund to support future opportunities in the green economy.

For all of the above reasons, I urge you to approve this contract so that CPNY can be part of New York's clean energy future.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Kaminsky". The signature is written in a cursive, flowing style with a prominent horizontal line above the first name.

Todd Kaminsky  
Senator, 9th District

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-3215**

January 25, 2022

Honorable Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3  
Albany, NY 12223

Re: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard

Dear Secretary Phillips:

I write regarding Clean Path New York, which was recently awarded a NYSERDA contract under the Tier 4 Renewable Energy Credit program. Clean Path demonstrates a clear commitment to environmental justice with a promise to create good-paying jobs, reduce our state's reliance on fossil fuels, and invest in generations of New Yorkers to come.

Asthma and other respiratory diseases are 2-3 times more common in the Bronx than anywhere else in New York City. After decades of fossil fuel-fired electric generation facilities polluting our air, it's no accident the Bronx has suffered the highest COVID-19 mortality rates citywide. Clean Path promises a 20% annual reduction in electric sector PM2.5 emissions, which are widely considered a primary risk factor for asthma and other respiratory diseases. Reducing these emissions will deliver tangible environmental benefits and lay the groundwork for a greener, healthier future for all New Yorkers.

Clean Path's economic investments will bring our state's workforce into the 21<sup>st</sup> century. The plan will create thousands of construction jobs, a \$270 million commitment that will enable meaningful strategic investments in underserved communities. These economic investments will generate over \$4.3 billion incremental economic benefits to the State, a large portion of which will directly benefit overburdened communities.

Clean Path is a critical tool to achieve New York's goal of 70% renewable energy by 2030. By transitioning New York to a clean energy economy, Clean Path will deliver meaningful climate justice to frontline communities that have long borne the harshest burdens of climate change.

Should you have any questions or wish to discuss the matter further, please do not hesitate to reach out to Genny Glembotzky in my office at [genny.glembotzky@mail.house.gov](mailto:genny.glembotzky@mail.house.gov). Thank you for your consideration.

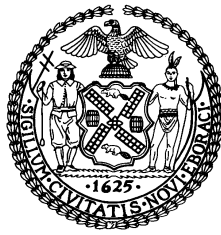
Sincerely,



Ritchie Torres  
Member of Congress

**CITY HALL OFFICE**  
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**DISTRICT OFFICE**  
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**THE COUNCIL  
OF  
THE CITY OF NEW YORK**

**JAMES F. GENNARO**

COUNCIL MEMBER  
TWENTY-FOURTH DISTRICT, QUEENS

**Chair**

Committee on Environmental Protection

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**COMMITTEES**

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WOMEN AND GENDER EQUITY

January 6, 2022

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza, Agency Building 3  
Albany, NY 12223-1350

**Re: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard.**

Dear Secretary Phillips:

As Chair of the New York City Council's Committee on Environmental Protection, I am writing in support of Clean Path New York, for which the New York State Energy Research and Development Authority recently filed petitions before the Public Service Commission to move forward under the Clean Energy Standard's Tier 4 Renewable Energy Credit Program.

As you know, New York is at a turning point in environmental policy. The decisions we make in the next decade on how we tackle climate change will have impacts on our environment for generations. This is a critical moment to eliminate our reliance on fossil fuels, reduce harmful carbon pollution, and help avoid the impacts of climate change. By transmitting power from renewable sources upstate to New York City, the Clean Path New York project will support new renewable energy production, immediately reduce our reliance on fossil fuels, and present bold new investment in the green economy.

The Clean Path New York project creates a path to transmitting over 7+ TWh of clean energy directly into New York City. In doing so, the project will build a portfolio of 3000+ MW of new onshore wind and solar with 10+ TWh of clean energy generation capability. The project will also have important impacts on reducing carbon emissions. By 2030, Clean Path New York will reduce New York State's annual CO2 emissions by 2.5 million tons, representing an overall 22 percent reduction in CO2 emissions from electric generation.

The project is also a once-in-a-generation investment in green jobs across the state. Clean Path will generate over \$4.3 billion in incremental economic benefits, 40 percent



of which will be invested directly in disadvantaged communities. That will amount to a \$1.8 billion dollar investment in communities across the state, and will produce thousands of good-paying jobs in the green economy.

We need to take bold action now to reduce pollution in our state and fight the impacts of climate change. By cultivating new renewable energy production upstate, investing in new green jobs in our communities, and fundamentally reducing our reliance on fossil fuels, this project represents a necessary step towards meeting our state's energy goals.

Again, I write to include my support for Clean Path NY. Should you have any questions or wish to discuss the matter further please don't hesitate to reach out to my office. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Gennaro". The signature is fluid and cursive, with the first name "Jim" and last name "Gennaro" clearly distinguishable.

James F. Gennaro  
New York City Council Member  
District 24



**DONOVAN RICHARDS**  
President

**CITY OF NEW YORK**  
OFFICE OF THE  
**PRESIDENT OF THE BOROUGH OF QUEENS**  
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January 12, 2022

Secretary Michelle L. Phillips  
New York State Public Service Commission  
Empire State Plaza, Agency Building 3  
Albany, NY 12223-1350

Dear Secretary Phillips:

I am writing to express my support of Clean Path New York, for which the New York State Energy Research and Development Authority recently filed petitions before the Public Service Commission to move forward under the Clean Energy Standard's Tier 4 Renewable Energy Credit Program. The borough of Queens, New York City and New York State are at a critical inflection point regarding environmental policy. The decisions we make to combat climate change in the years to come will have immeasurable impacts on our environment for generations, beginning with the elimination of our reliance on fossil fuels and the subsequent reduction of harmful carbon pollution. The Clean Path New York project is a critical part of that society-defining mission.

As the President of the Borough that has been devastated by generational storms like Superstorm Sandy and Hurricane Ida in just the past decade alone, I understand just how important bold climate leadership is. I am proud of my extensive record of environmental advocacy, but I also know it takes more than just the passage of laws to enact the swift change we need — it also takes bold administrative actions and investments to fully transition our state away from fossil fuels. By transmitting power from renewable sources upstate to New York City, the Clean Path New York project represents a tremendous step toward achieving that goal, immediately reducing our reliance on fossil fuels and fostering massive growth in the green economy.

The Clean Path New York project will allow for the transmission of over 7 terawatt-hours (TWh) of clean energy directly into New York City, while building a portfolio of 3000 megawatts of new onshore wind and solar power with 10 terawatt-hours of clean energy generation capability. By 2030, Clean Path New York will also reduce New York State's annual carbon dioxide emissions by 2.5 million tons, representing a 22 percent reduction in carbon dioxide emissions from electric generation. When it comes to green jobs, this project is a trailblazing investment in our economic future, generating more than \$4.3 billion in incremental economic benefits, 40 percent of which will be invested directly into frontline communities most heavily impacted by climate change. These investments include job training and workforce development, education, apprenticeships, healthcare services and so much more, all of which Queens is in need.

Climate change isn't coming. It's been impacting our communities for years. But Clean Path New York represents a massive step toward meeting our energy goals by cultivating new renewable energy production and fundamentally reducing our reliance on fossil fuels while creating thousands of green jobs. I emphatically support this historic plan.

Sincerely,

Donovan Richards  
President  
Borough of Queens



January 27, 2022

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

Re: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard.

Dear Secretary Phillips,

I am writing in support of the Clean Path New York project, which was submitted to NYSERDA's Tier 4 Request for Proposals solicitation last year.

As you know, The Association for a Better New York (ABNY) is a broad coalition of corporate, nonprofit, labor, educational, health, cultural, and government leaders focused on exploring and implementing ideas that keep New York City moving forward. With more than 250 member organizations, we continue to be a leader in the City's civic dialogue by utilizing the resources and expertise of our network to convene leaders, produce original research, and work with our members to advocate for important public policies that affect all New Yorkers.

It is vital we meet the state's goals for green energy while also making sure our state builds a climate for businesses to become more competitive in a green economy. I believe that the Clean Path NY project offers a once-in-a-generation opportunity to meet both goals while providing immense economic, environmental justice, and public benefits back to communities and businesses.

As our state shifts to renewables, we must ensure that the benefits of this transition are captured by all New Yorkers—workers, businesses, and communities. Clean Path NY will do just that by investing \$11 billion in New York's renewable infrastructure. Through new generation projects and transmission infrastructure, this ambitious endeavor will bring over 10,500 engineering, construction and operation, and maintenance jobs to the New York City region through the first three years of operation. Clean Path NY has also committed to a community benefits fund of \$270 million, which will focus on priorities such as workforce development so that the State's educational infrastructure will be able to support the green economy of the future.

We must ensure that economic impacts of this project are not simply temporary—businesses and communities need work to continue to grow. The Clean Path NY project will likely serve New York for more than 70 years, notably well beyond the 25-year term requested by NYSERDA. These benefits will be passed to ratepayers, who will see more than \$12 billion in savings in the first 25 years of the project, and taxpayers, who will see projected \$1.6 billion in tax and PILOT revenues over the 25-year term. Clean Path NY has also committed to environmental justice by directly investing in communities that are already impacted by disproportionate exposure to fossil fuel emissions. The project will provide \$6.25 billion in avoided social and public health costs over 25 years, 40% of which accrue to disadvantaged communities across the state.

It is also critical that a project of this size be constructed in a way that has the least negative impact on active businesses, communities, and infrastructure. The Clean Path NY proposal uses existing routes within NYPA's



Marcy-South corridor and State Department of Transportation rights of way. This will mitigate environmental, community, and economic concerns while strengthening the lines against extreme weather.

This state has put forth the laudable goal of 70% renewable energy by 2030. To meet this goal, private and public interests must cooperate to meet the rising needs of New York's power grid while allowing businesses to remain competitive. I believe the Clean Path NY project meets those needs while investing in New York businesses, creating savings for ratepayers, and building lasting, meaningful impacts in our communities. Again, ABNY writes in full support of the Clean Path NY project and urges NYSDERDA to approve their proposal. Should you have any questions or wish to discuss the matter further please do not hesitate to reach out to me at [mmiller@abny.org](mailto:mmiller@abny.org). Thank you for your consideration.

Yours for a Better New York,

A handwritten signature in black ink, appearing to read "Melva M. Miller", is written over a light blue horizontal line.

Melva M. Miller  
Chief Executive Officer



Heather C. Briccetti, Esq.  
President and CEO

January 28, 2022

The Honorable Michelle L. Phillips  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

RE: Case Number 15-E-0302 –Support for the Champlain Hudson Power Express (CHPE) +  
Clean Path NY (CPNY)

Dear Secretary Phillips:

On behalf of The Business Council of New York State, Inc., we write to express our continued support for projects that create jobs, provide significant economic benefits to New York businesses, support local communities and help New York State and New York City achieve their climate change goals.

Specifically, we are writing to share our support for the Champlain Hudson Power Express (CHPE) and the Clean Path NY (CPNY) projects that were recently selected and received finalized contracts under the Tier 4 process by the New York State Energy Research and Development Authority (NYSERDA).

This transformational transmission line has the potential to deliver at least 1,000 MW of clean, carbon-free power directly to New York City at a time when predictability and reliability are paramount.

The Business Council has supported this project since NYPA and NYSERDA's initial New York renewable energy solicitation. It is remarkable that in only a few short years, the energy landscape of New York State and New York City has changed rather dramatically.

Today, The Business Council reaffirms our continued support for CHPE.


- During the peak of construction, CHPE is projected to create 1,000 jobs for IBEW members, from operating engineers to laborers, and 1,100 secondary jobs. With construction scheduled to commence in 2021, these jobs will come at a time when New York's economy will need them most.
- CHPE is a \$3 billion infrastructure investment in New York State. From the beginning of construction through the first 30 years of operation, CHPE will deliver \$28.6 billion in economic benefits to New York state including \$1.7 billion for communities. From reduced wholesale electricity costs and lowered CO2 emissions to enhanced economic output, benefits from this project will foster growth in the state, New York City, and the region for decades to come.
- Both New York State and New York City have adopted aggressive greenhouse gas emission reduction laws. Meeting these goals will require projects that can be developed now - like CHPE. In the wake of the shutdown of Indian Point, CHPE can replace half of Indian Point's generation with clean, renewable hydropower.

We can all agree that once this stressful time has passed, New Yorkers will be eager to get back to work. CHPE will create a substantial number of new jobs when the economy, communities, and families will need them most.

As we continue to look to grow our business community, we must also acknowledge the ever-changing landscape here in New York State. The Business Council recognizes that meeting increased energy demand and transitioning to the new clean economy will require the development of countless new projects. The \$3 billion CHPE is poised to create myriad benefits for the State and City for decades to come.

We support this project and lend our support to your efforts to bring new, clean power to New York City by 2025.

Sincerely,

A handwritten signature in black ink, reading "Stephen C. Brucetta". The signature is written in a cursive, flowing style.

/kp





800 Westchester Avenue  
Suite S-310  
Rye Brook, NY 10573  
p: 914.948.2110  
f: 914.948.0122

December 9, 2021

The Honorable Michelle L. Phillips  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223-1350

Dear Secretary Phillips:

I am the Executive Vice President/COO of the Business Council Westchester (BCW) the county's only business membership organization focusing on economic development and advocacy, with over 1,000 members, including multinational corporations, hospitals universities, biotech pioneers, not-for profits, and companies of all sizes. One of the top legislative priorities that the BCW has been engaged in over the last ten years is Westchester's changing energy landscape.

As we deal with challenges Westchester County will face, it is critical that we support projects that will help the county continue to have the energy resources we need to not have a serious reliability problem. For that reason, the BCW supports the Champlain Hudson Power Express (CHPE) and the Clean Path (CPNY) projects as part of the recent four projects that were recently selected and received finalized contacts from the New York State Energy Research and Development Authority (NYSERDA).

The selection under consideration by the Commission is vital in helping Downstate New Yorkers keep their grid reliable and to meet the state's strict emissions-free power requirements issued under the Climate Leadership and Community Protection Act (CLCPA)- especially now that Indian Point Nuclear Power Plant is closed. It was our largest source of clean energy and a major source of revenue that provided local economic development as well as tax revenue. Our region is now almost entirely dependent on natural gas for power generation at the same time is pushing the state to have 70% of its power come from renewable energy by 2030. Westchester businesses have also faced the untenable situation of service prohibitions because it has become nearly impossible to get energy infrastructure built. We must change the paradigm, nearly all of New York's clean energy potential is upstate while most of the population lives downstate. If we do not approve the contracts and proposals before the Commission, we have no realistic chance of meeting the requirements of state law, and our grid will remain bottlenecked which will cause us to have a less reliable power grid.

The economic and environmental benefits of these projects have been clearly demonstrated and they will be felt statewide. Approving these projects would mean billions in public health benefits and result in the removal of seventy-seven million tons of carbon dioxide emissions over the next 15 years, according to data from Governor Houchel's administration. The projects are expected to provide over \$8 billion in new economic development for the entire state and help create 10,000 new jobs throughout New York. The projects will also provide billions in significant local tax revenue and in new investments for frontline communities in new job training and community revitalization efforts.

For all the above-mentioned reasons, the BCW urges the New York Public Service Commission to approve these vital projects which will only serve to help the businesses and residents of Westchester County. Thank you for your attention to this matter.

Sincerely,



John Ravitz  
Executive Vice President/COO





December 21, 2021

The Honorable Michelle L. Phillips  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**RE: Case Number 15-E-0302**

Dear Secretary Phillips:

On behalf of the Capital Region Chamber, I write today to share our support for the Champlain Hudson Power Express (CHPE) and the Clean Path NY (CPNY) projects as part of the recent tier 4 projects that were recently selected and received finalized contracts from the New York State Energy Research and Development Authority (NYSERDA).

The Capital Region Chamber represents over 2,800 businesses and organizations that employ more than 160,000 area residents. The Chamber is a unifying force for progress, leading opportunities for businesses to succeed, and for people and our communities to prosper. Increasingly, our membership, their leadership, and the communities where they reside are looking for opportunities to help improve energy sustainability, reduce emissions, and find opportunities for growth. The Commission has such an opportunity in front of them in the form of these contracts which will meet those objectives, improve grid reliability, and provide real, tangible benefits to both public health and the entire economy of New York State.

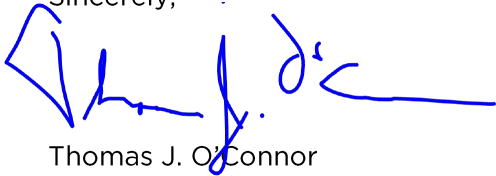
According to data provided by Governor Kathy Hochul's Administration, these projects represent the largest renewable energy and infrastructure investment in the last 50 years and will result in the removal of seventy-seven million tons of carbon dioxide emissions over the coming years. These projects are expected to provide over \$8 billion in new economic development for all New Yorkers and would create 10,000 new jobs for the state's skilled trades. By working in tandem, these projects will provide billions in significant local tax revenue and new investments for frontline communities in new job training and community revitalization efforts.

The state must act soon if it is to have a realistic chance of meeting the ambitious clean energy requirements set by the Climate Leadership and Community Protection Act (CLCPA). The CLCPA requires the state to generate 70% of its power from renewable resources by 2030. Yet, according to federal data we only meet a fraction of that objective now. NYSERDA has long pointed out the fact that New York is operating under a "Tail of Two Grids" where nearly 90% of our clean energy resources are located upstate and we cannot get them downstate due to transmission bottlenecks. That means the state must start approving new clean energy infrastructure now and get serious about the future needs of our grid.

There is an important added benefit in these projects. It is our understanding that the selected contracts have built in provisions to help minimize impacts to consumer bills and that New York City has committed to providing \$1 billion to help reduce the costs for these projects. From the Chamber's perspective, we believe it is time to move these critical projects forward. They will provide much needed transmission infrastructure to help improve our grid, reduce carbon emissions, and bring additional New York-produced clean energy online while providing economic opportunity for our entire state.

Thank you for the opportunity to provide the Chamber's comments. On behalf of the Capital Region Chamber, I respectfully request the Commission's approval of these contracts.

Sincerely,



Thomas J. O'Connor  
Vice President, Government Relations

**UNITED TO DRIVE ECONOMIC PROSPERITY WITH  
ONE VOICE, ONE MISSION, ONE REGION.**

[capitalregionchamber.com](http://capitalregionchamber.com) | 518.431.1400



January 24, 2022

The Honorable Michelle L. Phillips  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**RE: Case Number 15-E-0302**

Dear Secretary Phillips:

On behalf of the Center for Economic Growth (CEG), I write today to share our support for the Champlain Hudson Power Express (CHPE) and the Clean Path NY (CPNY) projects as part of the recent tier four projects that were recently selected and received finalized contracts from the New York State Energy Research and Development Authority (NYSERDA).

CEG is dedicated to driving economic growth in New York's eight-county, 1.1-million-person Capital Region. As the nonprofit regional economic development organization, we do this by attracting investment and talent; growing manufacturing and workforce capabilities, leveraging industry clusters, and developing the entrepreneurial ecosystem. Increasingly, our region is looking for opportunities to help improve energy sustainability, reduce emissions, and find opportunities for growth. The Commission has such an opportunity in front of them in the form of these contracts which will meet those objectives, improve grid reliability, and provide real, tangible benefits to both public health and the entire economy of New York State.

According to data provided by Governor Kathy Hochul's Administration, these projects represent the largest renewable energy and infrastructure investment in the last 50 years and will result in the removal of seventy-seven million tons of carbon dioxide emissions over the coming years. These projects are expected to provide over \$8 billion in new economic development for all New Yorkers and would create 10,000 new jobs for the state's skilled trades. By working in tandem, these projects will provide billions in significant local tax revenue and new investments for frontline communities in new job training and community revitalization efforts.

The state must act soon if it is to have a realistic chance of meeting the ambitious clean energy requirements set by the Climate Leadership and Community Protection Act (CLCPA). The CLPA requires the state to generate 70% of its power from renewable resources by 2030. Yet, according to federal data we only meet a fraction of that objective now. NYSERDA has long pointed out the fact that New York is operating under a "Tail of Two Grids" where nearly 90% of our clean energy resources are located upstate and we cannot get them downstate due to transmission bottlenecks. That means the state must start approving new clean energy infrastructure now and get serious about the future needs of our grid.

There is an important added benefit in these projects. It is our understanding that the selected contracts have built in provisions to help minimize impacts to consumer bills and that New York City has committed to providing \$1 billion to help reduce the costs for these projects. From CEG's perspective, we believe it is time to move these critical projects forward. They will provide much needed transmission infrastructure to help improve our grid, reduce carbon

emissions, and bring additional New York-produced clean energy online while providing economic opportunity for our entire state.

Thank you for the opportunity to provide CEG's comments. On behalf of CEG, I respectfully request the Commission's approval of these contracts.

Sincerely,

A handwritten signature in black ink, reading "Mark N. Eagan". The signature is fluid and cursive, with the first name "Mark" and last name "Eagan" clearly legible.

Mark N. Eagan, CCE  
President and CEO



December 15, 2021

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza, Agency Building 3  
Albany, NY 12223-1350

**Re: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard.**

Secretary Phillips,

Citizens Campaign for the Environment (CCE) is a 120,000 member, non-profit, non-partisan organization that empowers communities and advocates solutions to protect public health and our environment in New York, Connecticut, and throughout the nation. CCE strongly supports renewable energy mandates set forth in the *Climate Leadership and Community Protection Act* and works throughout New York to advance renewable energy projects and policies that will allow communities to transition away from fossil fuels. In addition to supporting local wind, solar, and energy storage projects, **CCE also supports transmitting upstate wind and solar energy to the downstate NY grid via the Clean Path Energy Project.**

One major obstacle the state faces in reaching our CLCPA goals is that there is a “tale of two grids”. Upstate uses 88% zero-emission resources but only represents 1/3rd of the energy load, while downstate is 2/3rds of the load and 69% fossil fuels. NYC presents a unique challenge to achieving CLCPA goals and is almost entirely reliant on fossil fuels, with outdated local peaker plants polluting disadvantaged communities. Due to space limitations, there is little possibility of replacing fossil fuel plants with local, large-scale renewables such as those established in upstate NY and Long Island.

Offshore wind presents an amazing and substantive opportunity for NYC to transition away from fossil fuels, while providing local jobs and economic benefits to disadvantaged communities. Empire wind and Beacon wind alone will generate over 2,000 mw, or over 18% of NYC’s power, and there will likely be several more offshore wind projects over the next ten years delivering power to NYC residents. ***However, the city cannot be entirely reliant on offshore wind, therefore, the transmission of additional renewable energy resources is a necessary addition to NYC’s renewable mix.***

Clean Path NY has been selected by NYS to build a 1,300 MW transmission line that will bring renewable energy from upstate NY to downstate NY. The project would be able to deliver more than 7.9 million megawatt-hours of emissions-free energy every year via an underground transmission line. This project will also enable the buildout of over 3,000 mw of new solar and on-shore wind power, further advancing good renewable energy jobs upstate while offsetting the need for polluting peaker plants in NYC. Overall, this project will reduce New York State's annual CO2 emissions by 2.5 million tons while investing \$1.8 billion dollars in our communities and kickstarting the green energy economy across the state. This is a win-win for New Yorkers and is critical in achieving our CLCPA mandates.

CCE strongly supports the Clean Path NY project and urges the NYS Public Service Commission to advance this project under the Clean Energy Standard's Tier 4 Renewable Energy Credit Program.

Sincerely

A handwritten signature in dark ink, reading "Adrienne Esposito". The signature is fluid and cursive, with the first name "Adrienne" being more prominent than the last name "Esposito".

Adrienne Esposito  
Executive Director



**COLUMBIA UNIVERSITY**  
IN THE CITY OF NEW YORK

February 1, 2022

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, NY 12223-1350

Re: CASE 15-E-0302

Dear Secretary Phillips:

Columbia University is pleased to provide public comment on CASE 15-E-0302 - Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and Clean Energy Standard, and proud to support the laudable efforts of Governor Hochul and the New York State Energy Research and Development Authority (NYSERDA) to deliver transformative amounts of clean, renewable solar, wind, and hydroelectric power from upstate New York and Canada into New York City. When each clean energy transmission project comes online, Clean Path New York (CPNY) and Champlain Hudson Power Express (CHPE) will contribute significant carbon reductions to the electric grid and dramatically reduce the city's fossil fuel use for electricity. Both projects are a critical step forward towards meeting the State's target of 70% renewable energy by 2030 under the Climate Leadership and Community Protection Act.

New York State's efforts to secure clean energy transmission into New York City are also necessary to support all of us who are committed to both achieving net zero through electrification and aligning with New York City's Local Law 97. These Tier 4 projects will enable that work and support all organizations that want to participate in this clean energy transition.

At Columbia, we are committed to playing our part in confronting the climate crisis. Just last year, we launched the world's first climate school. The Columbia Climate School is dedicated to advancing climate science, delivering climate solutions, and empowering the next generation of climate leaders. Our ability to source net zero emission electricity is vital to the University's ability to meet its own science-based targets outlined in [Plan 2030](#), our ten-year strategic sustainability plan that puts Columbia on a path to achieve net zero emissions by 2050 or sooner. Last September, Columbia increased its own ambitions and declared that it would no longer install fossil fuel connections in new campus construction projects. CPNY and CHPE would significantly support our ability to meet our goals.

We urge the Public Service Commission to approve both CPNY and CHPE and look forward to continue collaborating with New York State as we all pursue action to align with the key goals of the Paris Agreement, clean the air in our surrounding communities, and end the world's addiction to fossil fuels—all part of our commitment to empowering the next generation of climate leaders.

Sincerely,



David M. Greenberg  
Executive Vice President  
University Facilities and Operations

February 7, 2022

Honorable Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3  
Albany, NY 12223-1350

Re: Proceeding on Motion of the Commission to Implement a Large-Scale  
Renewable Program and a Clean Energy Standard

Dear Secretary Phillips,

The Long Island Association writes in support of Clean Path New York, a large-scale transmission project recently awarded a contract by NYSERDA under the Tier 4 Renewable Energy Credit program, which will help meet New York State's climate goals while also boosting our economy.

The Long Island Association, the region's leading business organization, supports decarbonizing our energy mix and that job creation and economic impact that comes along with it. Clean Path New York should result in \$1.8 billion in project-specific expenditures and more in additional economic benefits. The project is projected to result in thousands of new construction jobs generated in its first years of construction. Additionally, the Clean Path New York project has stated they will create a community benefits fund of \$270 million to support opportunities in the green economy for the next generation.

For the aforementioned reasons, the New York State Public Service Commission should move this critical project forward. Thank you.

Sincerely,



Matt Cohen  
President & CEO





New York State Office  
195 New Karner Road  
Suite 200  
Albany, NY 12205

Tel: 518-690-7850  
Fax: 518-869-2332  
[www.nature.org/newyork](http://www.nature.org/newyork)  
[@nature\\_ny](mailto:@nature_ny)

February 2, 2022

VIA ELECTRONIC MAIL

Honorable Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223

**RE: 15-E-0302 - Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard**

Dear Secretary Phillips:

The Nature Conservancy NY submits this letter of support for the two projects advanced for approval by the New York State Energy Research Development Authority (NYSERDA) under the new Tier 4 of the Clean Energy Standard (CES) to deliver clean energy to New York City. The Clean Path New York and Champlain Hudson Power Express (CHPE) projects will create a pathway to transmit more than 7.5 million megawatt-hours (MWh) of emissions-free energy and deliver 1,250 MW of hydropower to New York City.

The Nature Conservancy is a global conservation organization dedicated to conserving the lands and waters on which all life depends. Guided by science, we create innovative, on-the-ground solutions to our world's toughest challenges so that nature and people can thrive together. We are tackling climate change, conserving lands, waters and oceans at an unprecedented scale, providing food and water sustainably and helping make cities more sustainable. Working in 72 countries, we use a collaborative approach that engages local communities, governments, the private sector, and other partners.

New York State has set one of the country's most ambitious climate and clean energy goals with the enactment of the Climate Leadership and Community Protection Act (CLCPA), calling for 70 percent renewable energy by 2030 and 100 percent emissions-free electricity by 2040. For decades, long-standing transmission constraints in the upstate New York area have hindered the environmental, economic and public health benefits of clean energy projects from reaching load-bearing areas such as New York City. Approving the proposed agreements between NYSERDA and Clean Path New York and CHPE will help the state to achieve its clean energy goals and deliver renewable energy to New York City, as well as reduce greenhouse gas emissions (GHG) and air pollution, further the transition to a clean energy economy by creating thousands of good paying jobs and invest in disadvantaged communities.

For example, Clean Path New York is projected to reduce New York State's GHG emissions by 2.4 million tons annually, reducing overall emissions from the State's electricity sector by 22 percent. In addition, the project will generate \$4.3 billion in economic benefits, and invest \$1.8 billion in

disadvantaged communities across the state. The CHPE project is projected to reduce GHG emissions by 37 million metric tons between 2025 and 2040, provide \$3.5 billion in economic benefits, and will establish a \$117 million environmental trust fund to improve water quality across the Hudson, Harlem, and East Rivers and Lake Champlain. In addition to creating more than 4,000 new jobs, the project will invest \$40 million in jobs training programs, including retraining workers within the fossil fuel industry through the establishment of a Green Economy Fund.

Given the long lasting economic, environmental and public health benefits of these projects, coupled with their ability to help New York achieve its aggressive climate goals, The Nature Conservancy NY urges the Public Service Commission to approve these agreements advanced by NYSERDA.

Sincerely,

Echo D. Cartwright  
Director, Climate Mitigation  
The Nature Conservancy NY  
[Echo.Cartwright@tnc.org](mailto:Echo.Cartwright@tnc.org)



## THE NEW BRONX CHAMBER OF COMMERCE, INC.

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January 31, 2022

The Honorable Michelle L. Phillips  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

### **Re: Case Number 15-E-0302 - Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard**

Dear Secretary Phillips:

On behalf of the New Bronx Chamber of Commerce, I am writing to express support of Clean Path New York, a large-scale generation and transmission project recently awarded a contract by the New York State Energy Research and Development Authority (NSYERDA) under the Tier 4 Renewable Energy Credit program.

The Bronx Chamber represents a broad array of corporate, nonprofit, educational, health, cultural, and small business members, working in concert with government leaders and other organizations to enhance the business landscape in our borough, representing 350 members to advocate for important public policies that affect our Bronx business community and create jobs. We believe it is vital to make sure our state builds a climate for businesses to become more competitive in a green economy, while meeting the state's goals for green energy.

I believe that the Clean Path NY project offers a once-in-a-generation opportunity to meet both goals while providing immense economic, environmental justice, and public benefits back to communities and businesses. As our state shifts to renewables, we must ensure that the benefits of this transition are captured by all New Yorkers—workers, businesses, and communities. Clean Path NY will do just that by investing \$11 billion in New York's renewable infrastructure, an ambitious endeavor anticipated to bring over 8,300 jobs to New York State in the first three years of operation. Clean Path NY has also committed to a community benefits fund of \$270 million, which will focus on priorities such as job training, education, apprenticeships and other opportunities to facilitate a just transition to the green economy for this generation and the next.

Meeting the CLCPA goals will require bold, thoughtful collaboration between the private and public sectors in the form of projects like Clean Path New York. This project is a clear win/win for New Yorkers that will help reduce our reliance on



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Joanna Simone - Simone Development

Steve Squitieri - D & J Ambulette Service

Janet Vasquez - Janitorial Multi Services LLC

& JV Public Relations

Robert Walsh - Manhattan College

fossil fuel generation, create family-sustaining jobs, and improve public health.

The Clean Path New York project will bring renewable power generated in upstate New York directly to New York City where electricity today is generated almost entirely from fossil fuels, helping our State meet its climate and public health goals by reducing reliance of these generation facilities. This will cut air pollution in the surrounding areas too often impacted by high rates of asthma (such as the Bronx), and other public health challenges.

This state has put forth the laudable goal of 70% renewable energy by 2030. To meet this goal, private and public interests must cooperate to meet the rising needs of New York's power grid while allowing businesses to remain competitive. I believe the Clean Path NY project meets those needs while investing in New York businesses, creating savings, and building lasting, meaningful impacts in our communities.

Again, the Bronx Chamber strongly supports the Clean Path NY project and urges the NYS Public Service Commission to advance this project under the Clean Energy Standard's Tier 4 Renewable Energy Credit Program.

Should you have any questions or wish to discuss further, please do not hesitate to contact me at [lisa@bronxchamber.org](mailto:lisa@bronxchamber.org). Thank you for your consideration.

Sincerely,

Lisa Sorin

President

The New Bronx Chamber of Commerce Inc.



January 28, 2022

Honorable Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223

RE: 15-E-0302 - Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard

Dear Secretary Phillips,

The New York League of Conservation Voters (NYLCV) is a statewide environmental organization that advocates to protect clean air and water, preserve natural resources, and combat climate change. NYLCV has consistently advocated for NYSERDA to procure as much renewable energy as feasible under Tier 4 of the Clean Energy Standard, most recently by requesting Governor Hochul to prioritize Tier 4 procurement early on in her term as Governor and by its inclusion in our state policy agenda.<sup>1</sup> We applauded the announcement made in the fall of 2021 that NYSERDA had selected two projects to deliver on clean energy to New York City. We support projects like those in the contract agreements advanced by NYSERDA with Clean Path New York and Champlain Hudson Power Express (CHPE), which promise to create a pathway to transmit over 7 TWh and deliver 1,250 MW of hydropower to New York City, respectively.

With the enactment of the landmark Climate Leadership and Community Protection Act (CLCPA), New York set some of the most ambitious clean energy goals in the U.S., calling for 70% renewable energy by 2030 and 100% emissions-free electricity by 2040. Yet while upstate New Yorkers with access to a 90% zero-emission grid are already reaping the public health and environmental benefits of clean energy, downstate New Yorkers have struggled to access these

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<sup>1</sup> [https://nylcv.org/wp-content/uploads/NYLCV\\_2022\\_State\\_Policy\\_Agenda\\_0105221.pdf](https://nylcv.org/wp-content/uploads/NYLCV_2022_State_Policy_Agenda_0105221.pdf)



same benefits, instead facing the lasting negative effects of a grid that relies 77% on fossil fuels.<sup>2</sup> If the agreements between NYSERDA and Clean Path New York and CHPE are approved, the State will be well on its way to remedying this “Tale of Two Grids.”

Not only will both the Clean Path New York and CHPE projects help achieve the State’s clean energy goals and bring renewable energy to New York City, they will also help reduce greenhouse gas emissions and air pollution, create green jobs, and invest in disadvantaged communities. For instance, Clean Path New York is projected to reduce the State’s greenhouse gas (GHG) emissions by 2.4 million tons annually, reducing overall emissions from the State’s electricity sector by 22%. It also promises to generate \$4.3 billion in economic benefits, with \$1.8 billion invested in disadvantaged communities statewide.

For its part, CHPE is projected to reduce GHG emissions by 37 million metric tons between 2025 and 2040 while providing \$3.5 billion in economic benefits. It will also support the establishment of a \$117 million environmental trust fund to improve water quality across the Hudson, Harlem, and East Rivers and Lake Champlain. In addition to the creation of over 4,000 new jobs, the project promises to invest \$40 million in jobs training programs - with an emphasis on retraining for workers in the fossil fuel industry - through the establishment of a Green Economy Fund.

Due to their substantial, lasting environmental and economic impacts, it is clear that both projects NYSERDA selected for Tier 4 are a win for New York’s climate goals and its communities. NYLCV supports Governor Hochul and NYSERDA’s decision to select these projects and hopes to see these contracts approved by the Public Service Commission.

Sincerely,

Julie Tighe  
President  
New York League of Conservation Voters

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<sup>2</sup><https://www.nyiso.com/documents/20142/2223020/2021-Power-Trends-Report.pdf/471a65f8-4f3a-59f9-4f8c-3d9f2754d7de>



NY Renews Coalition  
via email [Info@nyrenews.org](mailto:Info@nyrenews.org)

January 18, 2022

**Regarding: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard.**

Dear Public Service Commission, and Secretary of the Department of Public Service:

We are writing in support of Clean Path New York, which was recently awarded a contract by NYSERDA under the Tier 4 Renewable Energy Credit program.

Clean Path NY presents an opportunity to align goals for both a greener New York and reversing inequities in frontline communities. By directly investing in communities, providing good paying jobs, and reducing the reliance on fossil fuels, Clean Path New York will provide lasting positive impacts on communities that will be felt for generations to come. The Clean Path Project can provide an alternative to harmful polluting power plants, particularly in communities that have borne a disproportionate burden. NY Renews strongly supports the call of South Bronx advocates urging NYPA to couple the Clean Path Project with a coordinated plan to retire highly polluting fossil fuel power plants sited in disadvantaged communities; in doing so, Clean Path New York's proposal has the potential to substantially advance environmental justice. Additionally, the path has to continue to be carefully evaluated to minimize impact and avoid undermining local determination and leadership.

NY Renews is a coalition of over 300+ environmental, justice, faith, labor, and community groups, and the force behind the nation's most progressive climate law, New York's Climate Leadership and Community Protection Act. The coalition fights for good jobs and climate justice in New York State.

NY Renews is one of the leading advocates for environmental justice in New York State. Communities of color have been disproportionately negatively impacted by the siting and operation of fossil fuel-fired electric generation facilities and other noxious uses within their neighborhoods for far too long. The health and economic impacts of these decisions have a ripple effect on every aspect of life. It is time that we not only invest in clean technologies that will

alleviate the negative impact of these facilities, but also invest in these communities at the same time.

The project will deliver intrinsic benefits in the form of significant emissions reductions including a 20% annual reduction PM2.5 emissions from the electric sector each year. Reducing PM2.5 emissions will have clear public health benefits for frontline communities, as these emissions are widely considered to be the primary driver of conditions like asthma and are linked to severe COVID-19 outcomes. If coupled with the rapid retirement of fossil fuel peaker plants in communities like the South Bronx, Western Queens, and Sunset Park, Brooklyn, the CleanPath project can provide concrete, immediate public health benefits to frontline communities overburdened by multiple fossil fuel pollution sources.

Additionally, the project will generate over \$4.3 billion incremental economic benefits to the State, a large portion of which will be invested directly in frontline communities. A project of this scale can also support communities by providing access to new, good paying jobs. Clean path NY will create thousands of construction jobs and has prioritized investments in workforce development as part of its community benefits fund, a \$270 million commitment that will enable meaningful strategic investments that will benefit members of frontline communities for decades to come.

The state's climate law requires that we achieve 70% renewable energy by 2030. We must ensure that a proper allocation of benefits resulting from the transition to a clean energy economy is directed to communities most impacted by climate change. In short, we need projects that deliver meaningful climate justice to our frontline communities; and we believe that Clean Path New York will do that.

Should you have any questions or wish to discuss the matter further please do not hesitate to reach out to Stephan Edel Coalition Coordinator at NY Renews.

Sincerely,

NY Renews

CC: Governor Hochul,  
Lt Governor Benjamin,  
Climate Action Council Members

Submitted by Stephan Edel, Coalition Coordinator, for New York Renews.

Full list of coalition members at [www.nyrenews.org](http://www.nyrenews.org)





**NEW YORK STATE BUILDING &  
CONSTRUCTION TRADES COUNCIL  
BUILDING & CONSTRUCTION TRADES  
COUNCIL OF GREATER NEW YORK**



February 1, 2022

Honorable Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3  
Albany, NY 12223

Re: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard Dear Secretary Phillips:

Dear Secretary Phillips;

The New York City and New York State Building and Construction Trades Councils ("the Councils") together represent over 200,000 construction workers across New York State. As the President of both these Councils, I am writing in support of Clean Path New York, a large-scale transmission project recently awarded a contract by NYSDA under the Tier 4 Renewable Energy Credit program. The Councils urge approval of the contracts by PSC so that Clean Path can begin the detailed development work including permitting efforts, securing supply contracts, workforce development, and infrastructure development for the project.

Clean Path has already committed to the creation of good union jobs and its good faith negotiation of an appropriate Project Labor Agreement(s) to cover construction work. Such a commitment allows local construction unions to plan for recruitment, training, and a skilled and ready supply of labor to meet the demands of this Tier 4 project, thus serving the State's interest in workforce development. The Councils' and Clean Path's mutual interest in creating good jobs in the growing green energy economy will also advance the State's interest in economic recovery from the pandemic. By providing good paying jobs, directly investing in communities, and reducing reliance on fossil fuels, Clean Path New York will improve our climate while providing benefits back to our communities and businesses.

The Councils and our members have been at the forefront of advocating for new green projects, energy-efficient initiatives, and ensuring that the new jobs that come with them are good paying jobs with family sustaining wages and benefits that can support our local communities.

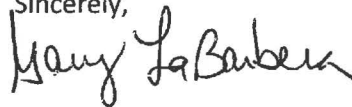
The Clean Path New York project will help our state meet its climate goals while also boosting our economy. It is projected that the project will generate over \$4.3 billion in incremental economic

benefits, with \$1.8 billion in project-specific expenditures going directly back into communities across the state. Even in its first years of construction, this will generate thousands of good-paying construction jobs, providing further benefits to neighboring communities and businesses.

The Clean Path New York project presents a bold step towards New York's clean energy future while creating pathways to good-paying, reliable jobs across the state.

The Councils submit their support for the approval of the contracts for Clean Path New York. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Gary LaBarbera". The signature is written in a cursive, flowing style.

Gary LaBarbera  
President



January 18, 2022

The Honorable Michelle L. Phillips  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**RE: Case Number 15-E-0302 – Letter of Support for the Champlain Hudson Power Express (CHPE) + Clean Path NY (CPNY)**

Secretary Phillips,

On behalf of the New York State Economic Development Council and our members, I would like to share our support for the Champlain Hudson Power Express (CHPE) and the Clean Path NY (CPNY) projects that were recently selected and received finalized contracts under the Tier 4 process by the New York State Energy Research and Development Authority (NYSERDA). These projects will re-energize New York's economy, invest in our local communities, create thousands of construction jobs, and help support the creation of jobs across New York.

The New York State Economic Development Council (NYSED) is the state's principal organization representing nearly 1,000 economic development professionals from across the State of New York. NYSED's mission is to promote the economic development of the state and its communities, to encourage sound practices in the conduct of regional and statewide development programs, and to develop education programs that enhance the professional development skills of our members.

The proposal before the Commission is a critical solution to create significant economic opportunity across New York by bringing large amounts of new clean energy into our grid and de-bottleneck our electric transmission system with new, much-needed infrastructure while maintaining reliability and keeping consumer costs in check. It is urgent that we move forward as a state with smart, forward-thinking projects like these that will go a long way to start meeting the state's clean energy requirements to generate 70 percent of its electricity with renewable energy by 2030.

The reduced air emissions and the projects before the PSC will remove the equivalent of 77 million tons of carbon emissions over the next 15 years. Supporting these projects in tandem also means significant and sustained economic benefits for all New Yorkers. CHPE and CPNY will provide over \$8 billion in new economic development for the entire state and help create 10,000 new jobs throughout New York. The projects will also provide billions in local tax revenue as well as \$460 million in new local investments by providing green job training, support public health and help restore and revitalize disadvantaged communities.

The CHPE project is fully permitted and has undergone extensive environmental reviews by both state and federal agencies and is expected to be in service by 2025. This means New Yorkers can soon start making real, tangible progress on its far-reaching climate requirements under the Climate Leadership and Community Protection Act (CLCPA). That's why this announcement is supported by such a broad array of public officials, diverse organizations, environmental groups and skilled labor and building trades who recognize the tremendous potential before New York.



NYSED C and our members understand that attracting private sector investment and opportunities means our businesses and residents need access to reliable, and affordable clean energy resources. These contracts meet that test of providing balance between our environmental protection goals and the incorporation of a consumer price cushion to help mitigate the cost impacts of bringing this transmission and energy online. We support the CPNY and CHPE and encourage you to adopt these contracts and help New York move forward in a more sustainable fashion.

Thank you for the opportunity to provide our perspective today.

Sincerely,

Ryan M. Silva  
Executive Director

Maureen Halahan  
*President/CEO*



40 Matthews Street, Suite 108  
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The Honorable Michelle L. Phillips  
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New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

January 21, 2022

**RE: Case Number 15-E-0302 - Letter of Support for the Champlain Hudson Power Express (CHPE) and Clean Path NY (CPNY)**

Dear Secretary Phillips,

On behalf of the Orange County Partnership (OCP), I write today to share our strong support for the Champlain Hudson Power Express (CHPE) that was selected and received a finalized contract along with the Clean Path NY Project by the New York State Energy Research and Development Authority (NYSERDA).

The Orange County Partnership (OCP) is a private not-for-profit center of economic development that serves as the external marketing agency for business development in Orange County. The Partnership is a resource for development opportunities and offers site selection assistance, financing options, and employment training in Orange County. For decades, the OCP has attracted numerous companies to the Mid-Hudson Region of southeastern New York.

Under state law, the Climate Leadership and Community Protection Act (CLCPA) mandates that 70% of New York's electric power mix must be renewable by 2030. The CHPE Large-scale hydropower that will go a long way towards meeting that requirement and it will provide \$50 billion in benefits to all of New York State over the life of the project. Most of these benefits will be distributed throughout the state (energy cost savings, construction jobs, tax revenue increases, and economic development), and over \$17 billion in expected electricity cost savings throughout the State. This means New York consumers will benefit from additional sources of supply and infrastructure that can provide affordable, reliable and stable energy to meet New York's clean energy goals at a lower cost. Affordable clean energy infrastructure contributes to future economic development opportunities that will not only attract more economic development, but will help drive public health benefits from improved air quality



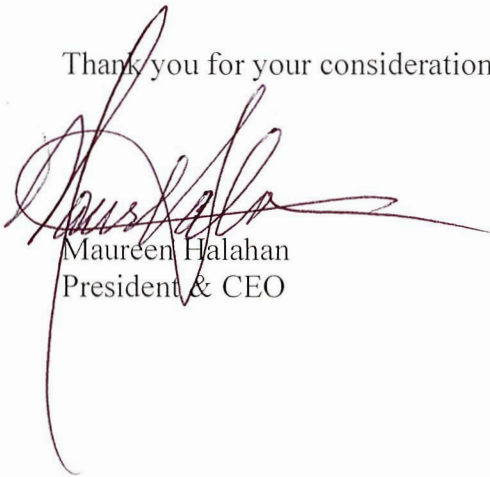
with lower carbon emissions and reduced air pollution. The backers of the CHPE project have created a Green Economy fund with a commitment to invest \$40 million in local communities and to partner with organizations both from upstate to downstate to create localized job training programs.

New York is such a diverse state, and because of the dichotomy between up and downstate, it has been labeled as a “Tale of Two Grids”. The NYC region is now nearly 90% reliant on fossil fuel energy for power since the closing of Indian Point back in April of 2021 when downstate lost its largest source of emissions-free power. The new transmission from this project will help address the “Tale of Two Grids” by bringing enough power for 1.2 million homes. If approved by the Commission this project alone could take the carbon emissions equivalent of 44%

of New York City’s cars off the street. In addition, this project has been fully permitted by both state and federal regulators and will can start delivering power soon if the Commission moves forward with approval.

To conclude, energy is a non-partisan issue, and the environment is vitally important to us, the businesses in Orange County, and the residents that live here. Our Governor, Kathy Hochul announced two recommended contract awards back in September of 2021. The Champlain Hudson Power Express (CHPE) and Clean Path NY. (CPNY) We urge the Public Service Commission to move forward with these two projects and give New York State a fighting chance to meet its emissions requirements in a responsible and reliable way.

Thank you for your consideration,



Maureen Halahan  
President & CEO

January 25, 2022

The Honorable Michelle L. Phillips  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

Re: Case Number 15-E-0302 - Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard

Dear Secretary Phillips:

The Real Estate Board of New York (REBNY) is New York City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY's members include global leaders in sustainable real estate development and ownership and support New York's efforts to achieve the targets set in the Climate Leadership and Community Protection Act (CLCPA).

I am writing in support of Clean Path New York, a large-scale generation and transmission project recently awarded a contract by the New York State Energy Research and Development Authority (NYSERDA) under the Tier 4 Renewable Energy Credit program. Meeting the CLCPA goals will require bold, thoughtful collaboration between the private and public sectors in the form of projects like Clean Path New York. This project is a clear win/win for New Yorkers that will help reduce our reliance on fossil fuel generation, create family-sustaining jobs, and improve public health.

The Clean Path New York project will bring renewable power generated in upstate New York directly to New York City where electricity today is generated almost entirely from fossil fuels, including generation located in New York City's environmental justice communities. Consequently, the project will help our State meet its climate and public health goals by reducing reliance of these generation facilities, cutting air pollution in the surrounding areas too often impacted by high rates of asthma and other public health challenges.

Clean Path New York will also boost New York's growing green economy. The entire \$11 billion investment will go toward projects located within New York State, centering and prioritizing environmental justice and economic development in communities on the frontlines of climate change. Clean Path New York will create more than 8,300 good-paying green jobs in construction, engineering, and operations—providing further benefits to neighboring communities and businesses. The Clean Path New York project has also committed to a \$270 million community benefits fund to support job training, education, apprenticeships and other opportunities to facilitate a just transition to the green economy for this generation and the next.

Additionally, NYSERDA's Tier 4 program, which includes the establishment of a voluntary resale market for renewable energy credits (RECs), will provide a pathway for real estate owners in New York City to participate directly in supporting clean energy. By increasing the availability of RECs from new wind and solar generation and the efficient transmission of renewable energy downstate, Clean Path New York ensures that building owners can meet their emission reduction obligations and be active partners in New York's ambitious carbon neutrality goals.

As documented by NYSERDA in its “Petition Regarding Agreement for Procurement of Tier 4 Renewable Energy Certificates” on November 30, 2021, we expect that demand for Tier 4 RECs from our membership will be robust. Not only do our members already procure RECs as part of their ESG programs, but Tier 4 RECs will serve alongside energy efficiency as an important mechanism through which building owners will be able to comply with the carbon emissions limits codified in Local Law 97.

The Clean Path New York project presents a bold step towards New York’s clean energy future. We must take this opportunity to shore up our economy, improve our public health and address climate risks head on.

Thank you for your consideration.



James Whelan  
President





January 28, 2022

The Honorable Michelle L. Philips  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223-1350

**RE: Case Number 15-E-0302 – Letter of Support for Tier 4 Renewable Energy Credit Procurement**

Dear Secretary Philips,

Urban Green Council is an environmental nonprofit dedicated to reducing the carbon footprint of New York City buildings. In keeping with our mission, Urban Green has joined many other organizations to advocate for procurement of as much renewable energy for New York City as feasible under Tier 4 of the Clean Energy Standard.

We write today in support of the petition from NYSERDA and the Department of Public Service (DPS) for approval of Tier 4 renewable energy credit (REC) contracts for two winning projects selected after a robust and comprehensive evaluation process: (1) the Clean Path NY (CPNY) and (2) the Champlain Hudson Power Express (CHPE).<sup>1</sup>

New York State's mandate for 70 percent renewable electricity by 2030 under the Climate Leadership and Community Protection Act (CLCPA) cannot be reached without a major influx of new renewable energy into New York City's electricity grid. Today, that grid is virtually all fossil fuel-powered due to a lack of local clean energy and transmission bottlenecks that limit the delivery of upstate renewables to the downstate region.<sup>2</sup>

Approval of the petition will address those challenges and put New York State and New York City on the path to reaching shared climate goals. The CPNY and CHPE projects would deliver a combined 18 million megawatt hours per year of clean, renewable power into NYC's electricity grid by 2027 – more than one-third of today's citywide annual electricity demand.<sup>3</sup> As legislation

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<sup>1</sup> NYSERDA and DPS [Petition Regarding Agreements for Procurement of Tier 4 Renewable Energy Certificates](#), Nov. 30, 2021, 1.

<sup>2</sup> NYISO [Power Trends 2021](#) Report.

<sup>3</sup> NYSERDA and DPS [Petition](#), 1-2.

like New York City's Local Law 97 of 2019 and Local Law 154 of 2021 push buildings towards efficient electrification, this injection of clean power into the local grid will be more important than ever.

The petition from NYSERDA and DPS is the result of a rigorous and comprehensive solicitation and scoring process that progressed from 18 eligibility applications to seven proposals and ultimately to these two winning projects based on a determination that they will yield enormous benefits for New Yorkers. Along with clean power and fewer greenhouse gas emissions, CPNY and CHPE will:

- Improve regional public health by reducing air pollution from fossil fuel combustion;
- Invest over \$8 billion in in-state economic development;
- Create approximately 10,000 family-sustaining jobs;
- Invest \$460 million in community benefit funds;
- Direct significant investment toward disadvantaged communities; and
- Deliver an estimated \$3 billion to \$7 billion in net economic benefits.

Given the substantial economic, environmental and public health benefits for New Yorkers, Urban Green supports Governor Hochul, DPS and NYSERDA's selection of these projects. Approval of this petition would be a major down payment on our clean energy future, driving the carbon emission reductions required by the CLCPA and boosting our economy with green jobs and investments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Mandyck". The signature is fluid and cursive, with the first name "John" and last name "Mandyck" clearly distinguishable.

John Mandyck  
CEO, Urban Green Council



Feb 1, 2022

**Honorable Michelle L. Phillips**

Secretary to the Commission

New York State Public Service Commission

Agency Building 3

Albany, NY 12223-1350

Re: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard

Dear Secretary Phillips:

I am writing in support of Clean Path New York, a clean energy project selected by the New York State Energy Research and Development Authority under the Clean Energy Standard's Tier 4 Renewable Energy Credit Program and currently under review before the Public Service Commission.

Clean Path New York will go a long way in reducing the greenhouse gas emissions and air pollutants produced by burning fossil fuels, which is tragically where 90% of New York City's current electricity comes from. The negative effects of burning fossil fuel are well documented and our community in western Queens, known as Asthma Alley, has borne the brunt of the impact caused by the peaker plant located across the street from our homes..

The Clean Path New York project will create a path to transmitting clean energy directly into New York City, generated by new onshore wind and solar plants upstate, reducing our reliance on fossil fuels. Furthermore, Clean Path will generate over \$4.3 billion in incremental economic benefits, 40% of which will be invested directly in disadvantaged communities like the ones we serve, resulting in thousands of green jobs.

Our city and state can be leaders in the green economy. Projects like Clean Path will enable us to move away from fossil fuels for good. This is why they have my support.

Bishop Mitchell G. Taylor

CEO and Co-Founder

Urban Upbound

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza, Agency Building 3  
Albany, NY 12223-1350

Re: Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard.

Dear Secretary Phillips:

I am writing in support of Clean Path New York, for which the New York State Energy Research and Development Authority recently filed petitions before the Public Service Commission to move forward under the Clean Energy Standard's Tier 4 Renewable Energy Credit Program. As you know, New York is at a turning point in environmental policy. The decisions we make in the next decade on how we tackle climate change will have impacts on our environment for generations. This is a critical moment to eliminate our reliance on fossil fuels, reduce harmful carbon pollution, and help avoid the impacts of climate change. The Clean Path New York project is a vital part of that mission.

I write as someone who has worked on environmental issues for more than a decade, fighting for a more sustainable NYC. Growing up in Western Queens, I know the burden fossil fuel production has had on our families creating an asthma alley where the zip codes 11101, 11102 and 11106 have higher than the Queens borough average in respiratory illness. By transmitting power from renewable sources upstate to New York City, the Clean Path New York project will support new renewable energy production, immediately reduce our reliance on fossil fuels, and present bold new investment in the green economy. It will also hasten our ability to shut down dirty peaker plants/baseload polluters making the air here in Queens cleaner for our families.

The Clean Path New York project creates a path to transmitting over 7+ TWh of clean energy directly into New York City. In doing so, the project will build a portfolio of 3000+ MW of new onshore wind and solar with 10+ TWh of clean energy generation capability. The project will also have important impacts on reducing carbon emissions. By 2030, Clean Path New York will reduce New York State's annual CO2 emissions by 2.5 million tons, representing an overall 22% reduction in CO2 emissions from electric generation.

The project is also a once-in-a-generation investment in green jobs across the state. Clean Path will generate over \$4.3 billion in incremental economic benefits, 40% of which will be invested directly in disadvantaged communities. That will amount to a \$1.8 billion dollar investment in communities across the state, and will produce thousands of good-paying jobs in the green economy.

We need to take bold action now to reduce pollution in our state and fight the impacts of climate change. By cultivating new renewable energy production upstate, investing in new

green jobs in our communities, and fundamentally reducing our reliance on fossil fuels, this project represents a necessary step towards meeting our state's energy goals.

Again, I write to include my support for Clean Path NY. Should you have any questions or wish to discuss the matter further please don't hesitate to reach out [costanycc@gmail.com](mailto:costanycc@gmail.com) . Thank you for your consideration.

Sincerely,

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