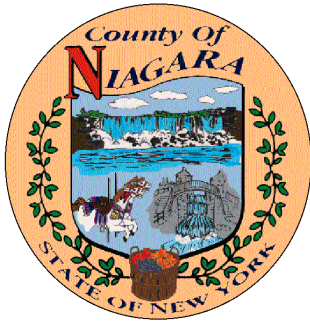




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New York State Draft Energy Plan Comments
Prepared and submitted by Niagara County 3rd District Legislator Christopher J. McKimmie

Niagara County recognizes the importance of building a more reliable, resilient electric system for all New Yorkers and commends the pragmatic approach of the Draft State Energy Plan (SEP). Focused efforts that guide energy infrastructure toward reliability, affordability and resilience must include diverse energy sources and consider current grid operations, energy markets, fueling, technology, and infrastructure in advance of decarbonization.

The transition to electrification is not a sensible pathway if the infrastructure capacity to support it is lacking and if the cost of electricity fails to deliver sufficient savings to offset the high upfront capital investments. The SEP Energy Affordability Impacts section shows that the most reliable way to achieve monthly energy savings is through the conventional replacement of fossil-fueled appliances and vehicles with newer, more efficient fossil-fueled models. While households that pursue efficient electrification may see reductions in monthly energy use, those gains are erased once capital investment costs are included—ultimately leading to an average 31% increase in monthly expenses.

We appreciate the opportunity to provide comments on the State Draft Energy Plan and offer the following observations:

- The clean-energy transition must deliver tangible economic development opportunities to Niagara County, not just distant benefits. Investments in grid resilience and reliability are necessary — but financing those investments must not disproportionately shift costs to ratepayers unless assurance related to increased costs will directly benefit the immediate infrastructure serving them. The State must adopt cost-allocation rules and procedures that reflect service areas so that resilience does not become a regressive tax on smaller communities.
 - The SEP must ensure New York’s electric system can handle demand surges by modernizing and expanding distribution infrastructure on a realistic timeline, with a focus on Disadvantaged Communities to reduce energy insecurity and support local economic opportunities. While zero-emission goals are important, they must be balanced with reliability, affordability, and practical capacity needs. Natural gas remains a critical bridge fuel, yet the State continues to rely on imports from Pennsylvania instead of exploring responsibly developing in-state reserves. Similarly, advanced nuclear development is being pursued just four years after Indian Point’s closure, which had supplied nearly 10% of the State’s electricity and whose loss shifted demand to fossil fuel-dependent generation. Planning, permitting, and construction timelines for any new generation facility—regardless of fuel type—must be realistic to ensure energy remains affordable, reliable, and aligned with decarbonization objectives.
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- New York is the fourth largest liquid fuel market in the U.S., with transportation accounting for 79% of consumption. While the SEP mentions upfront cost barriers and “range anxiety” for electric vehicles (EVs), it lacks a full life-cycle cost analysis comparing per-mile costs of fuel versus electric vehicles. Affordability and practicality remain major barriers: buyers need clear information on total ownership costs, incentives, infrastructure availability, and real-world concerns such as cold-month performance and impacts on careers or recreation. Consumer confidence is further undermined by the loss of federal tax credits and the NYSDEC’s June 2025 decision delaying ZEV sales requirements for 2026 vehicles. Potential price increases under New York’s Cap and Invest program would disproportionately affect households, small businesses, and essential rural services like farming and transportation, further challenging the feasibility of a practical, equitable EV transition.
- With shifting federal priorities eliminating tax credits for efficient building envelopes—which, when combined with state incentives, have proven effective at reducing energy demand—does the State intend to implement specific programs to backfill these lost incentives? Additionally, what are the projected impacts of at-risk renewable development projects, including potential losses in energy generation, necessary grid upgrades, overall energy costs, and effects on decarbonization efforts?
- All New York energy bills include a state-mandated System Benefits Charge (SBC) to support clean energy and efficiency initiatives, yet the fee has increased 98% between 2020 and 2024 with little transparency on how rates are determined. Recent reallocation of \$271 million in SBC surplus funds away from renewable development toward low-income solar projects, without accountability for geographic distribution, shifts costs onto households and businesses—many in Niagara County already burdened by high energy bills and multi-year rate increases. Niagara County urges the Energy Plan to implement safeguards ensuring SBC funds remain aligned with their intended purpose, are capped, and are accompanied by agency accountability reports documenting expenditures, justification, future plans, ratepayer returns, and geographic allocation.

New York’s Climate goals focus on addressing the adverse impacts of climate change on public health and mitigating extreme weather events. While New York contributes just 3% of U.S. emissions and 0.8% globally, the State has a unique opportunity to demonstrate how achievable, affordable strategies can reduce emissions while prioritizing capacity, reliability, and affordability.

Niagara County stands ready to be a constructive partner in New York’s clean energy future. We respectfully ask the State to pursue decarbonization in a way that both advances climate goals and strengthens communities by protecting affordability, supporting local economic development, and ensuring just, statewide access to clean energy resources and infrastructure.

Sincerely,



Christopher J. McKimmie
3rd District Niagara County Legislator