



September 25, 2025

New York State Energy Planning Board
c/o New York State Energy Research and Development Authority
17 Columbia Circle, Albany, NY 12203

Dear Members of the Energy Planning Board,

On behalf of the Capital Region Chamber, which represents thousands of businesses and organizations across the Capital Region, I appreciate the opportunity to provide comments on the Draft 2025 New York State Energy Plan. Our Chamber supports efforts to reduce the carbon intensity of our economy. We believe that the state's energy policies must adopt an "all-of-the-above" approach to ensure access to secure, affordable, and reliable energy, protect energy consumers and their choices, and provide meaningful environmental progress. I respectfully submit the following observations and recommendations.

Policy Recommendations

Electrification & Clean Energy Transition

The CLCPA outlines an ambitious transition to a zero-emissions electric grid by 2040. While our Chamber supports reducing carbon intensity of our economy, we urge that implementation remains flexible and prioritize reliability, affordability, and consumer choice. The state's current energy plan and its accompanying goals have been proven to be unattainable in terms of timeframe, cost, and feasibility. The state has acknowledged that it does not expect to meet two of the CLCPA's principal mandates - 70% renewable energy generation and 40% greenhouse gas emission reductions by 2030. The Draft Plan should avoid setting unrealistic goals and timeframes. Instead, the plan should focus on realistic policies that do not compromise grid stability or impose disproportionate costs on businesses and consumers.

Building Decarbonization

The Draft Plan promotes widespread electrification of heating systems and energy efficiency retrofits. Our Chamber supports market-driven adoption and cost-effective solutions tailored to regional needs. The plan should avoid one-size-fits-all mandates and respect property owner autonomy, consumer preferences, and economic factors.

Transportation Electrification

The Draft Plan calls for expansion of EV infrastructure and fleet electrification. Any such expansion must be market driven and must promote consumer choice. The deployment of EV infrastructure must take into consideration the grids' capacity to support load growth and must minimize the cost to taxpayers, ratepayers, and consumers.

Energy Affordability

While the Draft Plan includes an affordability analysis, it acknowledges potential cost increases. The Chamber views affordable energy as essential to economic competitiveness. The plan should prioritize affordability in all implementation phases and robust cost-benefit analysis for proposed measure should be conducted. The CLCPA requires the state to evaluate the total potential costs of the Scoping Plan, particularly the costs of implementation. Although several stakeholders, including our Chamber, have requested this information, the state has yet to provide a comprehensive evaluation of the practical cost impacts of the state's energy transition on individuals, businesses, and industries in New York. This analysis must be provided to the public.

Grid Reliability & Energy Security

The Draft Plan includes investments in grid resilience and reliability studies. The Chamber strongly supports energy security as foundational to economic growth. The plan should accelerate investments in grid modernization and ensure that reliability metrics are central to all planning decisions.

Energy Sources

Renewable sources alone cannot meet the state's energy demands. Reliance on an all-electric system that is completely dependent upon renewable energy will cause system failure when supply does not meet demand, and alternative sources have been abandoned. It is imperative that any energy plan that transitions the state to a clean energy future does not undermine energy security and reliability, does not hinder economic growth, and does not increase consumer costs. An all-of-the-above approach is essential.

Nuclear Energy

The Chamber supports the continued use and development of nuclear energy as a reliable, zero-emission baseload power source. We recognize its critical role in maintaining grid stability while advancing climate goals. Investments in next-generation nuclear technologies should be encouraged to ensure long-term viability.

Natural Gas

Natural gas remains an essential component of New York's energy mix. The Chamber supports its continued use as a transitional fuel that provides reliability and affordability. We oppose

policies that prematurely eliminate natural gas infrastructure, particularly in regions where electrification may be cost-prohibitive. Existing gas networks must be retained, maintained, and upgraded to ensure that NG, RNG and hydrogen continue as options.

Offshore Wind

The Chamber supports the strategic development of offshore wind projects that are economically viable and environmentally responsible. We urge the state to ensure that supply chain investments and workforce development initiatives are aligned with regional economic opportunities.

Solar Energy

Solar energy is a key component of the clean energy transition. The Chamber supports policies that expand access to solar and encourage innovation in distributed generation.

Hydrogen Energy

Hydrogen presents promising opportunities for decarbonizing hard-to-electrify sectors. The Chamber supports pilot programs and research into green hydrogen production and utilization. We encourage the state to collaborate with industry stakeholders to develop scalable hydrogen infrastructure and regulatory frameworks that promote innovation and safety.

Thank you for your consideration of the Capital Region Chamber's perspective. I thank the Energy Planning Board for its leadership and commitment to a sustainable energy future. We urge the Board to adopt a balanced "all-of-the-above" approach to energy planning—one that prioritizes reliability, affordability, security, and economic competitiveness, alongside environmental stewardship. We welcome continued dialogue and stand ready to collaborate in shaping a sustainable energy future for New York.

Sincerely,



Mark N. Eagan, CCE
President and CEO

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ONE VOICE, ONE MISSION, ONE REGION.**

capitalregionchamber.com | 518.431.1400

5 Computer Drive South
Albany, NY 12205

58 Clifton Country Road, Suite 102
Clifton Park, NY 12065

1473 Erie Boulevard
Schenectady, NY 12305