

JANUARY 2024

A PEAK COALITION REPORT

# ACCELERATE NOW!

## THE FOSSIL FUEL END GAME 2.0

Tracking New York City's Peaker Power Plant  
Closures and the Clean Energy Transition

NYC Environmental Justice Alliance  
New York Lawyers for the Public Interest  
THE POINT CDC • UPROSE • Clean Energy Group

## ABOUT THIS REPORT

This report—prepared by the PEAK Coalition—UPROSE, THE POINT CDC, New York City Environmental Justice Alliance, New York Lawyers for the Public Interest, and Clean Energy Group—examines progress made toward transitioning New York City’s fleet of fossil fuel peaker power plants to clean alternatives over the past four years. The report serves as a companion to an earlier publication released by the Peak Coalition in 2021, “The Fossil Fuel End Game,” which detailed a strategic roadmap to retire and replace New York City’s entire fleet of fossil fuel peaker power plants with a combination of offshore wind, distributed solar, energy efficiency, and battery storage by 2030. This report explores the current state of this clean energy transition, examining the steps taken by the city, state, utilities, grid operator, and energy industry to hasten or delay the shift from polluting power plants to clean zero-emission alternatives and efforts by local communities to accelerate a just transition.

## ACKNOWLEDGEMENTS

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## The Fossil Fuel End Game 2.0

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and the Clean Energy Transition

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Prepared by

New York City Environmental Justice Alliance  
New York Lawyers for the Public Interest  
THE POINT CDC  
UPROSE  
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[www.peakcoalition.org](http://www.peakcoalition.org)

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# Introduction

Throughout New York City, in response to demand for electricity that cannot be met by other sources of energy generation, highly polluting “peaker” power plants fire up in the South Bronx, Sunset Park, and other communities of color, exposing people living in these communities to numerous health risks. These expensive and inefficient oil and gas peaker plants spew harmful emissions into neighborhoods already overburdened by pollution, exacerbating widespread health problems. Peakers are a prime example of how low-income communities and communities of color bear the brunt of a host of energy and industrial infrastructure that poses significant public health and environmental hazards.

The PEAK Coalition—UPROSE, THE POINT CDC, New York City Environmental Justice Alliance (NYC-EJA), New York Lawyers for the Public Interest (NYLPI), and Clean Energy Group (CEG)—aims to end long-standing pollution from peaker power plants and the negative effects on New York City’s most climate-vulnerable people. This coalition is the first comprehensive effort in the country to reduce the



**Victor Davila, a community organizer at THE POINT CDC, volunteering at the Boogie Down Bronx community event. PHOTO: JOANNA GARCIA/FREELANCE PHOTOGRAPHER**

harmful and racially disproportionate health impacts of a city's peaker plants by replacing them with renewable energy and energy storage solutions.

The PEAK Coalition officially launched in 2020 with the release of the “Dirty Energy, Big Money” report, which detailed how New York City’s peaker plants have perpetuated decades of health disparities in low-income communities of color while costing rate-payers billions of dollars.<sup>1</sup> Analysis of capacity payments found that an estimated \$4.5 billion in ratepayer dollars flowed to the owners of the city’s fleet of peaker plants over a decade, with payments predominately going to a few out-of-state companies and private equity firms. These exorbitant payments to peaker plant owners make electricity from New York City’s fossil fuel peaker power plants some of the most expensive power in the country. Additional costs come in the form of negative environmental and health impacts at the expense of surrounding community members. Children growing up within a few miles of a peaker plant are more likely to suffer from asthma and other health and developmental issues. “Dirty Energy, Big Money” made it clear that while most New Yorkers have the privilege of turning on the lights, not all areas in New York pay the same price.

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In 2021, this report was followed by the release of a detailed roadmap showing how peaker plants can be retired and replaced on a timeline consistent with New York’s energy commitments and climate goals by investing in environmental justice communities to enhance community resilience, promote equity, and create local clean energy jobs.<sup>2</sup> Prepared by Strategen Consulting on behalf of the PEAK Coalition, “The Fossil Fuel End Game,” set forth a specific strategy and policies to retire and replace New York City’s entire fleet of fossil fuel peaker plants by 2030, with approximately half of the city’s capacity replaced by 2025.<sup>3</sup> Replacement of the city’s expensive and inefficient fleet of peaker plants through the aggressive development of wind, solar, energy storage, and efficiency measures would result in estimated savings of \$1 billion in energy costs by 2035, with an additional \$1 billion in savings due to reduced environmental and health impacts from avoided power plant emissions. The report included policy and regulatory recommendations that could make this critical transition happen while ensuring power system reliability and minimal financial impact on ratepayers.

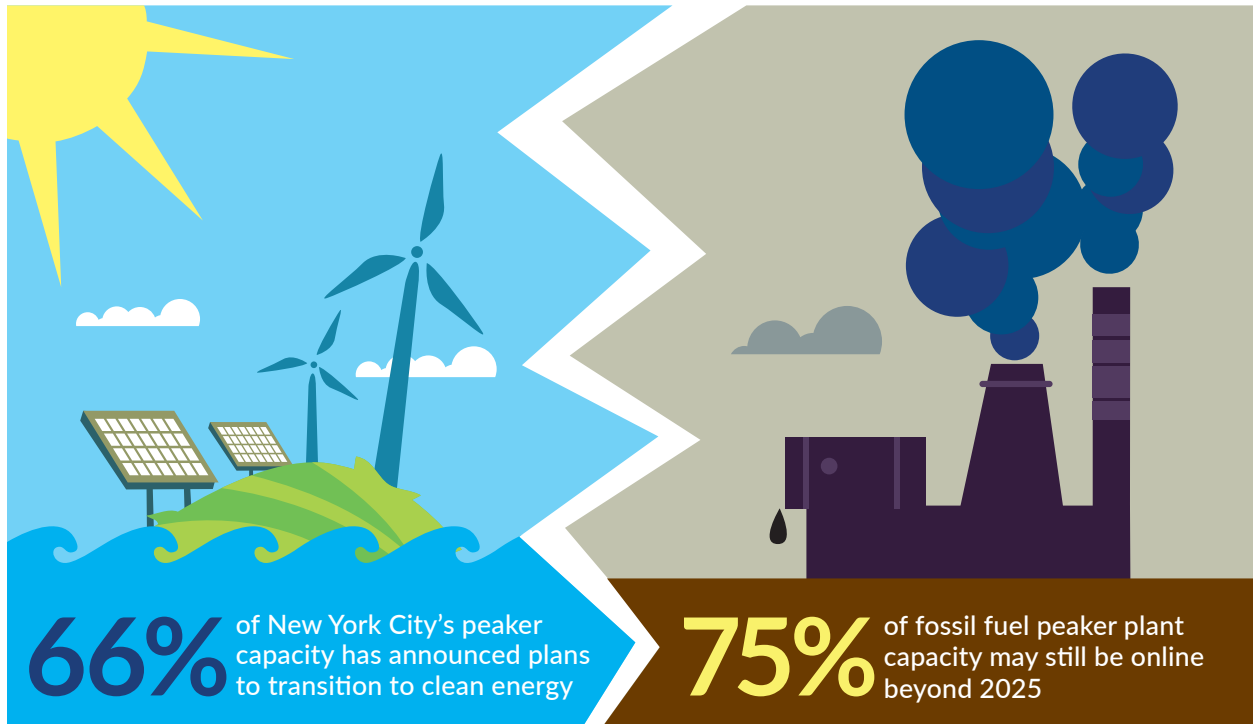
1 PEAK Coalition, “Dirty Energy, Big Money,” *peakcoalition.org*, May 6, 2020, <https://www.cleaneenergy.org/publication/dirty-energy-big-money> (accessed December 1, 2023).

2 New York’s Climate Leadership and Community Protection Act mandates a state energy mix that comes from 70 percent renewable resources, a zero-emissions electricity grid by 2040, and a mix of solar, wind, and energy storage development targets, prioritizing Disadvantaged Communities (DACs) across the state.

3 Strategen Consulting, “The Fossil Fuel End Game: A Frontline Vision to Retire New York City’s Peaker Plants by 2030,” *peakcoalition.org*, March 15, 2021, <https://www.cleaneenergy.org/publication/fossil-fuel-end-game> (accessed December 1, 2023).

FIGURE 1: Progress and Delays

## Clean Energy is Replacing New York City's Peaker Power Plants, but the Transition is Moving Too Slowly



© Clean Energy Group

Since 2019, 4,019 megawatts of New York City's 6,093-megawatt fossil fuel peaker capacity has either retired or announced plans to replace existing turbines with clean alternatives, with just under 700 megawatts retired and another 700 megawatts actively moving toward deactivation or decommissioning. However, despite state regulations and mandates to reign in emissions from peaker plants, more than 75 percent of the city's fossil peaking capacity may remain online and operating past 2025. See Figure 1.

"Accelerate Now! The Fossil Fuel End Game 2.0" serves as a checkpoint in the transition to assess progress made to date. This report discusses the negative impacts these power plants are having on surrounding communities, highlights challenges and barriers impeding the speed of the transition, and recommends pathways forward to accelerate the transition of peaker plants to clean alternatives.

**Since 2019, 4,019 megawatts of New York City's 6,093-megawatt fossil fuel peaker capacity has either retired or announced plans to replace existing turbines with clean alternatives.**

# Peakers and a Legacy of Community Harm: A Story from the Bronx

**Victor Davila**, Community Organizer, THE POINT CDC

**T**he people of the South Bronx share a universal trauma. Whatever the particulars of their life circumstances, every child growing up in the South Bronx is acutely aware that the city does not care about them. The moment they step outdoors, it is clear that their neighborhoods are unimportant to the city. The infrastructure reflects historical scorn for their existence. The Bronx burned for a decade in the 1970s and 1980s, and city officials stood by and watched. Landlords set fire to buildings for insurance, and in reaction, local legislators slashed fire department funding to the Bronx in the hopes of driving residents out.

But thanks to the strength of community members, the spirit of the Bronx was able to resist the decade of fire; however, since then its infrastructure has continued to slowly choke the health of its residents.

In the Hunts Point neighborhood of the Bronx, one in every three children and one in every four adults suffer from asthma. It's so widespread that it's hardly considered a disability. Pollutants such as nitrogen dioxide have an impact on children's cognitive development. For much of its history, the Bronx has been a dump site for "vital" yet poisonous infrastructure, despite the fact that disproportionate infrastructure burdens are against New York City's own charter.

**In the Hunts Point neighborhood of the Bronx, one in every three children and one in every four adults suffer from asthma.**

The constant state of noxious air cuts the lives of many Bronx residents short. Year after year, the Bronx ranks 62nd out of New York's 62 counties in health outcomes.<sup>4</sup>

Over the long term, air pollution is known to increase the risk of stroke by hardening arteries in the brain, thickening the blood and raising blood pressure, all boosting the risk of clots in the brain. A member of the PEAK Coalition was made to witness their own father's stroke as a result of the environmental conditions they are forced to live in. This local father worked in the Hunts Point food market for 29 years, exposing himself to dangerous amounts of nitrogen dioxide pollution. He had a stroke at the age of 57 because of the environmental condi-

<sup>4</sup> County Health Rankings and Roadmaps, "Bronx, NY," *countyhealthrankings.org*, 2023, <https://www.countyhealthrankings.org/explore-health-rankings/new-york/bronx?year=2019> (accessed December 1, 2023).



tions at his home and at work. He suffered this stroke at work while operating a bulldozer. He managed to turn off the bulldozer before plummeting backwards 10 feet to the earth, saving his colleagues from additional disaster.

Thankfully, this man's story does not end there; he recovered completely. Many families are not so fortunate.

We cannot accept any infrastructure that jeopardizes the health and happiness of residents. If a Bronx worker could consider the safety of others at his most vulnerable moments, we have no excuse not to go above and beyond to provide as much support and safeguarding from environmental danger as we can.

The transition away from fossil fuels is just the beginning of what we owe working class people for being the foundation of this state.



**Hell Gate peaker plant in the South Bronx.** PHOTO: EMILY SWANSON

# Progress to Date

## SETTING THE STAGE—THE PEAKER LANDSCAPE IN 2019

In addition to being the most densely populated urban center in the United States, New York City is also home to the country's most densely concentrated fleet of urban power plants. This dubious distinction is due to several factors, most significantly, because of the city's high level of energy consumption and limited transmission capacity to bring in outside energy, which means that when demand peaks it must be met by local sources of power generation. According to the New York Independent System Operator (NYISO), in 2022, 7 percent of the electricity produced in upstate New York came from oil and fracked gas, whereas more than 95 percent of electricity produced in and around New York City came from oil and gas plants.<sup>5</sup>

**In 2022, 7 percent of the electricity produced in upstate New York came from oil and fracked gas, whereas more than 95 percent of electricity produced in and around New York City came from oil and gas plants.**

As detailed in Table 1, in 2019, the reference year PEAK Coalition used in preparing a community-led transition strategy for the city, New York City had 19 peaker power plants in operation, with a total of 89 individual turbines and a combined capacity of 6,093 megawatts (MW).<sup>6</sup> Many of these oil and gas-burning turbines are over 50 years old and lack modern pollution control technologies.

Because they are only called on during brief periods of high demand, such as hot summer days and cold winter mornings, these peaker plants do not operate most of the time and are ripe for replacement with clean technologies, including renewables, energy storage, demand reduction and flexibility, and energy efficiency. Most of the city's peakers operated for less than 5 percent of the year in 2019. Sixty of the city's fossil fuel peaker turbines ran for less than 1 percent of the time, less than 100 hours throughout the year.<sup>6</sup>

Even though fossil peaker plants don't run very often, they still produce a disproportionate amount of harmful emissions, largely due to their lack of adequate pollution controls. On some high-ozone days when air quality is poor, peakers can contribute as much as 94 percent of the state's nitrogen oxide (NOx) emissions, a toxic gas that leads to the formation of ground-level ozone and exacerbates respiratory and cardiovascular conditions in surrounding communities. About 750,000 people in New York City live within one mile of a peaker plant. As shown in Figure 2, 78 percent of these people are either low-income or people of color; many are both.

5 New York Independent System Operator, Inc., "2023 Power Trends: A Balanced Approach to a Clean and Reliable Grid," *nyiso.com*, revised August 14, 2023, <https://www.nyiso.com/documents/20142/2223020/2023-Power-Trends.pdf/7f7111e6-8883-7b10-f313-d11418f12fbf?t=1686132123808> (accessed December 1, 2023).

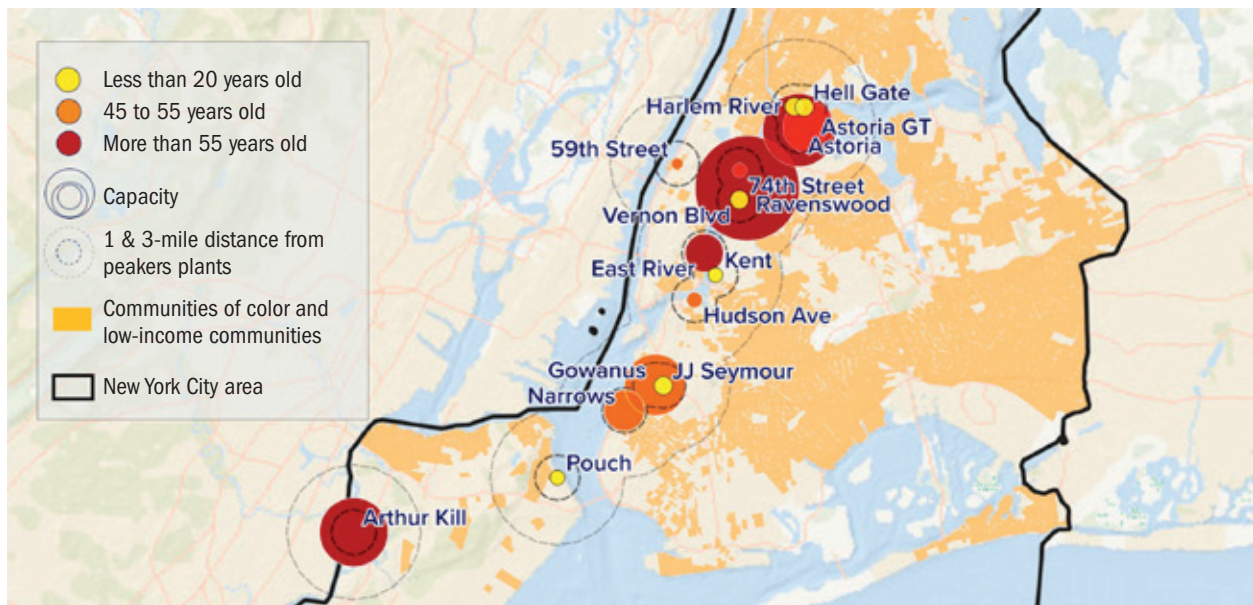
6 In this report, a peaker plant is defined as any fossil fuel unit with an annual generation equal to or less than 15 percent of its maximum installed capacity (i.e., with a capacity factor of 15 percent or less) during any of the previous three years of operation.

7 Strategen Consulting, "The Fossil Fuel End Game: A Frontline Vision to Retire New York City's Peaker Plants by 2030," *peakcoalition.org*, March 15, 2021, <https://www.cleangroup.org/publication/fossil-fuel-end-game> (accessed December 1, 2023).

TABLE 1: New York City Fossil Fuel Peaker Power Plants

Plant owner	Plant name	Location	Nameplate capacity (MW) [2019]	Current status [2023]	Transition plan
<b>Consolidated Edison</b>	59 Street	Manhattan	17	Operating	Planned transmission line may result in closure
	74 Street	Manhattan	37	Retired	Planned transmission line facilitated closure
	East River Steam Turbine	Manhattan	200	Operating	Unknown
	Hudson Avenue	Brooklyn	33	Retired	Site being redeveloped for offshore wind interconnection
<b>Eastern Generation/ ArcLight Capital Partners</b>	Astoria Generating Station	Queens	16	Operating—transition in process	Approved plan to build 135-MW battery storage system, deactivation notice submitted
	Astoria Steam Turbines	Queens	943	Operating	Unknown
	Gowanus	Brooklyn	640	Operating—partial transition in process	Announced plan to develop battery storage at site, deactivation notice submitted for 320 MW, NYISO designated remaining 320 MW as needed for continued reliability past 2025
	Narrows	Brooklyn	352	Operating—transition announced	Announced plan to develop battery storage at site, NYISO designated full capacity as needed for continued reliability past 2025
<b>NRG Energy</b>	Arthur Kill	Staten Island	20	Operating	Planned transmission line may result in closure
	Arthur Kill Steam Turbines	Staten Island	912	Operating	Unknown
	Astoria Gas Turbines	Queens	558	Retired	Site being redeveloped for offshore wind interconnection
<b>New York Power Authority</b>	Harlem River	Bronx	94	Operating—transition announced	Directed by the state to phase out peaker facilities by 2030, planned replacement with energy storage
	Hell Gate	Bronx	94		
	Kent	Brooklyn	47		
	Joseph J. Seymour	Brooklyn	94		
	Pouch	Staten Island	47		
	Vernon Boulevard	Queens	94		
<b>Rise Light &amp; Power/ LS Power</b>	Ravenswood	Queens	69	Retired	Site being redeveloped for offshore wind interconnection
	Ravenswood Steam Turbines	Queens	1827	Operating—partial transition in process	Planned offshore wind interconnection expected to close one 400-MW peaker turbine, announced plan to retire remaining capacity through additional offshore wind development and upstate renewables transmission line

FIGURE 2: New York City Fossil Fuel Peaker Power Plants (2019)



Source: Strategen

In 2019, 19 fossil fuel peaker power plants were in operation across New York City, with a combined capacity of 6,093 MW. Many of the peaker plants are more than 50 years old and lack effective pollution control devices, contributing to severe health impacts for the 750,000 mostly low-income and people of color community members living within one mile of a fossil peaker.

## LAYING THE GROUNDWORK FOR A JUST TRANSITION: POLICY AND REGULATION

New York policymakers and regulators enacted two key measures in 2019 that helped lay the groundwork for the retirement of peakers and the transition to clean resources that is currently underway—the Climate Leadership and Community Protection Act (a.k.a. the Climate Act or CLCPA) and new, lower NOx emissions limits for peaker plants, known as “the Peaker Rule.”

The New York State Climate Act was signed into law on July 18, 2019.<sup>8</sup> The final legislation reflects the input and advocacy of more than 200 community groups, led by New York Renews,<sup>9</sup> resulting in one of the most ambitious climate laws in the nation that recognizes environmental justice as a key element of addressing climate change. The Climate Act requires New York to reduce economy-wide greenhouse gas emissions by 40 percent by 2030 and by at least 85 percent by 2050 from 1990 levels. The law also established significant solar, energy storage, and offshore wind deployment targets and mandates a 70 percent renewable and fully zero-emission electricity system by 2030 and 2040 respectively. The Climate Act made explicit that the state’s ability to achieve a healthy and thriving future is dependent on its ability to ensure equitable access to clean energy and clean air for all residents, especially those living in historically disadvantaged communities that have borne the brunt of fossil fuel infrastructure and air

8 New York State, “Climate Act,” *climate.ny.gov*, 2023, <https://climate.ny.gov> (accessed December 1, 2023).

9 New York Renews, *nyrenews.org*, 2022, <https://www.nyrenews.org> (accessed December 1, 2023).

pollution. The Climate Act, and subsequent actions by state agencies, made it clear that fossil fuels are inconsistent with the state's climate strategy.

In December 2019, the New York State Department of Environmental Conservation (DEC) adopted more stringent ozone season NO<sub>x</sub> emissions limits for simple cycle and regenerative combustion turbines.<sup>10</sup>

The new limits were established by the DEC in response to New York's high levels of ozone in 2008 and 2015, which put the state in nonattainment for meeting National Ambient Air Quality Standards. The Peaker Rule set a NO<sub>x</sub> emission limit of 100 parts per million (ppm) that went into effect on May 1, 2023, and a lower limit of 25

**Replacing and retiring these older fossil units could reduce 1,849 tons of NO<sub>x</sub> emissions on some of the highest ozone days of the year, with its biggest impact felt in nearby communities.**

ppm for gaseous fuels and 42 ppm for liquid fuels that will take effect in 2025. The limits apply to all simple cycle and regenerative combustion turbines larger than 15 MW and affect the operations of approximately 3,400 MW of the oldest and least efficient peakers in New York City and Long Island. Affected units must either retire, suspend operations during ozone season (which is when peakers are most often called on to run), or retrofit with emission controls to reduce emissions. Based on DEC estimates, replacing and retiring these older fossil units could reduce 1,849 tons of NO<sub>x</sub> emissions on some of the highest ozone days of the year, with its biggest impact felt in nearby communities. The Peaker Rule forced the city's dirtiest peakers to prepare and implement compliance plans to meet the new emissions limits, creating an opportunity for accelerated retirement and replacement.

<sup>10</sup> Office of Climate, Air and Energy, New York State Department of Environmental Conservation, Letter to U.S. EPA, May 14, 2020, [https://www.dec.ny.gov/docs/air\\_pdf/siprevision2273.pdf](https://www.dec.ny.gov/docs/air_pdf/siprevision2273.pdf) (accessed December 1, 2023).

# A Transition Underway

**A**s of the end of 2023, the number of peakers in New York City has begun to decline. Of the 6,093 MW of fossil fuel peaker capacity operating in New York City in 2019, about two-thirds (4,019 MW) of peaker capacity has either retired or announced plans to replace existing turbines with clean alternatives (see Table 1 and Figure 3). Out of this total, just under 700 MW of peaking capacity that was operating in 2019 has fully retired, and plans have been announced to retire an additional 3,300 MW before 2040, of which approximately 700 MW is actively moving toward deactivation or decommissioning.

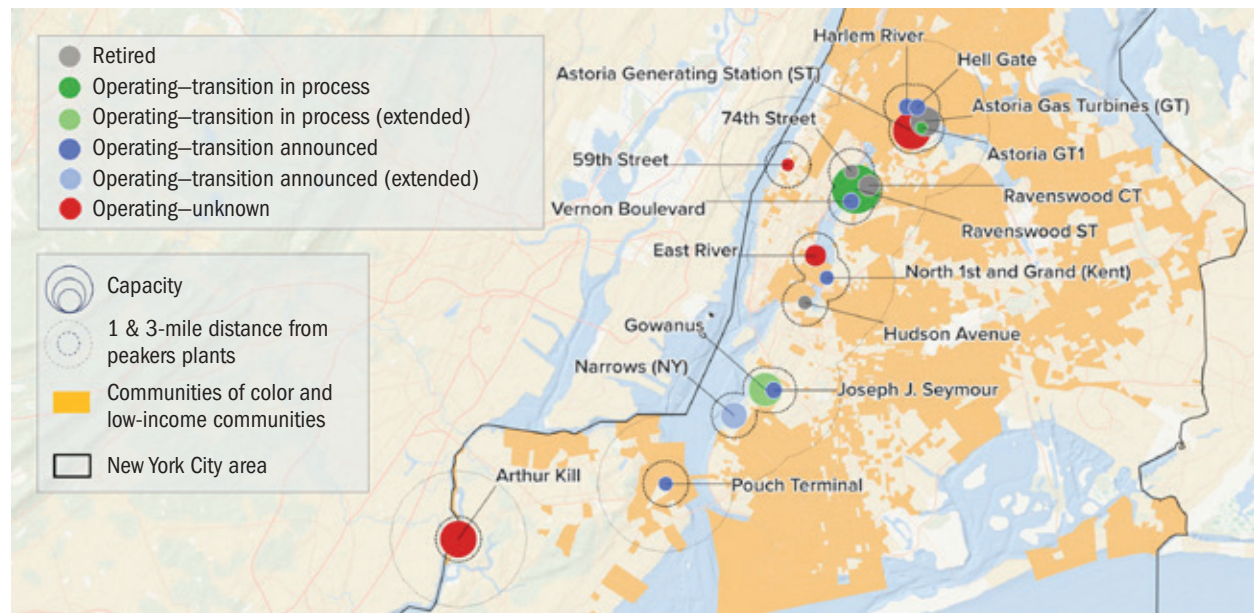
However, this encouraging progress has not occurred without significant pushback from the fossil fuel industry and attempts to perpetuate fossil fuel combustion in the city. DEC's new emissions limits should force most of the city's combustion turbines to retire in the next few years, but transition plans and timelines for several large steam turbines, which collectively represent more than half of New York City's peaking capacity, remain uncertain or completely unknown at this time. Despite the Peaker Rule taking full effect, New York City may still have more than 75 percent (4,591 MW) of its fossil peaking capacity online and operating in 2025.

**Despite the Peaker Rule taking full effect, New York City may still have more than 75 percent (4,591 MW) of its fossil peaking capacity online and operating in 2025.**



**View of the neighborhoods in Queens.** PHOTO: SEBASTIAN BAEZ/UPROSE

FIGURE 3: New York City Fossil Fuel Peaker Power Plants Transition Status



Source: Strategen

Since 2019, 4,019 MW of New York City’s fossil fuel peaker capacity has either retired or announced plans to replace existing turbines with clean alternatives, with nearly 700 MW retired and an additional 700 MW actively moving toward decommissioning and replacement. Despite this progress, 4,591 MW of fossil peaking capacity may still be in operation when the Peaker Rule takes full effect in 2025.

The following section provides more information about the transition of New York City’s peakers and the companies that own and operate the power plants, in part to demonstrate the varying tactics employed by each entity to comply with the goals mandated through the Climate Act and emissions limits established by the Peaker Rule.

## NRG ENERGY

NRG Energy, a large energy company headquartered in Houston, TX, owns two New York City peaker power plant facilities: Astoria Gas Turbines and Arthur Kill.

The Astoria Gas Turbines facility is a 558-MW gas plant in Queens that has been operating since 1970. The power plant’s path to clean energy has been a bumpy one. In 2020, NRG proposed compliance with the Peaker Rule by repowering its existing turbines with a new, more efficient 437-MW gas plant, dubbed the Astoria Replacement Project. The PEAK Coalition, in partnership with Chhaya CDC (a member of NYC-EJA), the Sierra Club, and Earthjustice, intervened on multiple occasions in opposition to the proposed repowering project.

First, the cohort published a letter<sup>11</sup> in November 2020 raising serious concerns regarding procedural and substantive deficiencies in NRG’s Final Scoping Document for the new gas plant, and then raised

11 PEAK Coalition, “Peak Coalition Letter Concerning the Astoria Replacement Project,” *cleanegroup.org*, November 6, 2020, <https://www.cleanegroup.org/publication/peak-coalition-letter-astoria-replacement-project> (accessed December 1, 2023).

additional concerns in detailed public comments<sup>12</sup> regarding DEC’s draft Title V Air Permit and Environmental Impact Statement for the proposed repowering. A comprehensive set of comments submitted in September 2021 petitioned DEC to deny the air permit because pollution from the plant would interfere with New York’s emission reduction targets, and was, therefore, inconsistent with the Climate Act. A month later, DEC agreed, ruling to deny the air permit for NRG’s proposed gas turbines, finding that the project was not in compliance with the requirements of the Climate Act and would impede the state’s ability to meet statewide greenhouse gas emissions limits.<sup>13</sup> The ruling also made it clear that false solutions, such as the project’s intent to eventually burn green hydrogen or renewable natural gas (RNG), are also inconsistent with the Climate Act.

After initially signaling that it would appeal the DEC ruling, NRG pivoted in late 2022 with a petition to the New York State Public Service Commission (PSC) seeking approval to sell the land underneath the Astoria Gas Turbine power plant to Beacon Wind.<sup>14</sup> Approval of the petition resulted in NRG’s withdrawal of its proposed gas repowering plan and allowed for redevelopment of the site to interconnect Beacon Wind’s 1,230-MW offshore wind project. In compliance with the Peaker Rule, NRG notified NYISO that the company intended to permanently cease operation of all 12 turbines at the Astoria Gas Turbines facility by May 1, 2023. The gas turbines at the site are no longer in operation.

NRG’s Arthur Kill facility on Staten Island dates back to 1959 and contains two types of peaking units, a 20-MW combustion turbine and two steam turbines totaling 912 MW. The smaller combustion turbine is subject to the Peaker Rule’s 2025 emission limits. According to information provided by NYISO, NRG has submitted compliance plans for the 20-MW peaker; however, the details of those plans have not been publicly disclosed at this time.<sup>15</sup> It is unclear whether NRG intends to continue operating the plant

**“This victory is for Astoria and all other environmental justice communities that have long maintained enough is enough. Fossil fuel power plants and the disproportionate impact they have on the environment and public health must be eliminated as soon as possible. New York is at an impetus where a just transition is no longer just a permitting requirement but an economic reality for a clean future. We remain steadfast in our fight for an emissions-free future for Asthma Alley residents and all New Yorkers in line with New York’s climate goals.”**

**DANIEL CHU**, ENERGY PLANNER, NYC-EJA<sup>16</sup>

“Astoria Peaker Plant to Beacon Wind,” Press Release, September 1, 2022

12 PEAK Coalition, “PEAK Coalition et al Comments on New York City Astoria Gas Plant Replacement,” [cleangroup.org](https://www.cleangroup.org/publication/peak-coalition-et-al-comments-on-new-york-city-astoria-gas-plant-replacement), September 14, 2021, <https://www.cleangroup.org/publication/peak-coalition-et-al-comments-on-new-york-city-astoria-gas-plant-replacement> (accessed December 1, 2023).

13 Division of Environmental Permit, New York State Department of Environmental Conservation, letter to Astoria Gas Turbine Power LLC, October 27, 2021, [https://www.dec.ny.gov/docs/administration\\_pdf/nrgastoriadecision10272021.pdf](https://www.dec.ny.gov/docs/administration_pdf/nrgastoriadecision10272021.pdf) (accessed December 3, 2023).

14 “Matter Master: 22-01814/22-E-0535,” *New York State Department of Public Service*, <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterSeq=68963&MNO=22-E-0535> (accessed December 3, 2023).

15 New York Independent System Operator, “Short-Term Assessment of Reliability:2023 Quarter 3,” [nyiso.com](https://www.nyiso.com/documents/20142/39103148/2023-Q3-STAR-Report.pdf), October 13, 2023, <https://www.nyiso.com/documents/20142/39103148/2023-Q3-STAR-Report.pdf> (accessed December 3, 2023). Figure 2: Status Changes Due to DEC Peaker Rule

16 New York Lawyers for the Public Interest, et. al., “NRG Files Petition to Sell Land Under Astoria Peaker Plant to Beacon Wind,” Press Release, September 16, 2022, [https://f1096961-3dc3-44e4-b248-f2d10eb29a01.usrfiles.com/ugd/f10969\\_a875f62eecd4ae0a6dfdcf1eaed5119.pdf](https://f1096961-3dc3-44e4-b248-f2d10eb29a01.usrfiles.com/ugd/f10969_a875f62eecd4ae0a6dfdcf1eaed5119.pdf) (accessed December 3, 2023).





**NRG's Arthur Kill peaker plant on Staten Island.** PHOTO: JUSTIN WOOD/NYLPI

in some capacity beyond the 2025 Peaker Rule deadline. A 2023 announcement from New York Governor Kathy Hochul stated that the completion of a new transmission line project would result in the closure of the Arthur Kill combustion turbine.<sup>17</sup> NRG has made no public statement regarding its future plans for the larger steam turbine portion of Arthur Kill, which the PEAK Coalition determined could be successfully retired by 2030.

## EASTERN GENERATION

Eastern Generation is an affiliate company of ArcLight Capital Partners, a large private equity firm focused on energy investments. Through the Astoria Generating Company, Eastern Generation owns and operates three large peaker plants in New York City: Astoria Generating Station, Gowanus, and Narrows.

Like NRG, Eastern Generation initially proposed repowering the 640-MW Gowanus peaker plant in Sunset Park, Brooklyn with new gas turbines. In 2019, Astoria Generating Company submitted plans to replace the existing Gowanus turbines, built on floating barges in the 1970s, with eight new combustion turbines totaling 610 MW of peaking capacity. The repowering proposal also indicated that Eastern Generation would retire its Narrows facility, a 352-MW peaker plant in Sunset Park that began operations

<sup>17</sup> New York State Governor's Office, "Governor Hochul Announces New Transmission Line to Deliver Clean Energy in Queens," Press Release, May 3, 2023, <https://www.governor.ny.gov/news/governor-hochul-announces-new-transmission-line-deliver-clean-energy-queens> (accessed December 3, 2023).

in 1972. UPROSE, which is based in and advocates for the Sunset Park community, intervened in opposition to the proposed repowering project with legal assistance from Earthjustice and NYLPI.<sup>18</sup>

At the end of 2021, two months after DEC ruled NRG's repowering project to be inconsistent with the Climate Act, Eastern Generation announced that the company was withdrawing its application to repower Gowanus. In the announcement, Eastern Generation stated its intention to build energy storage systems at its Gowanus, Narrows, and Astoria facilities.<sup>19</sup> While Eastern Generation submitted a deactivation notice for half of the peaking units at Gowanus, NYISO has taken actions to allow peaker operations at the Gowanus and Narrows facilities to continue past the 2025 Peaker Rule deadline.<sup>20</sup> On November 20, 2023, NYISO issued a Short-Term Reliability Process Report identifying multiple turbines at the facilities as necessary to avoid a potential grid reliability issue in 2025. NYISO indicated that this is a temporary solution, which is of little solace to surrounding communities. The implications of this type of reliability issue are discussed in more depth in the "Challenges Impeding the Transition" section of this report.

**At the end of 2021, two months after DEC ruled NRG's repowering project to be inconsistent with the Climate Act, Eastern Generation announced that the company was withdrawing its application to repower Gowanus. In the announcement, Eastern Generation stated its intention to build energy storage systems at its Gowanus, Narrows, and Astoria facilities.**

In June 2022, the PSC approved Eastern Generation's permit to build a 135-MW energy storage system at the Astoria Generating Station facility. In a statement about the approval, Eastern Generation again noted that the company is planning to submit applications for additional storage projects at Gowanus and Narrows, totaling 350 MW of energy storage capacity across the two sites.<sup>21</sup> Eastern Generation has submitted a deactivation notice to NYISO for the 16-MW peaker at the company's Astoria facility; however, the Peaker Rule does not apply to the three 60-year-old steam turbines at the site.<sup>22</sup> It is unclear whether the development of battery storage at the site will result in the retirement of these peaking units, which have a combined capacity of 943 MW.

18 Earth Justice and New York Lawyers for the Public Interest, "Case 18-F-0758 – Gowanus Generating Facility UPROSE's Comments on Astoria Generating Company, L.P.'s Proposed Stipulations," Letter to New York State Board on Electric Generation Siting and the Environment, February 24, 2020, <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={C2BF4398-B969-40D3-A771-165D816F75D6}> (accessed December 3, 2023).

19 Eastern Generation LLC, "Major New York City Power Producer Shifts Focus to Energy Storage," Press Release, December 16, 2021, <https://www.easterngeneration.com/2021/12/16/major-new-york-city-power-producer-shifts-focus-to-energy-storage> (accessed December 3, 2023).

20 New York Independent System Operator, "Short-Term Reliability Process Report: 2025 Near-Term Reliability Need," *nyiso.com*, November 20, 2023, <https://www.nyiso.com/documents/20142/39103148/2023-Q2-Short-Term-Reliability-Process-Report.pdf> (accessed December 3, 2023).

21 Eastern Generation LLC, "ArLight's Eastern Generation Gets Green Light from State for Clean Energy Storage in Astoria," Press Release, June 21, 2022, <https://www.easterngeneration.com/2022/06/21/arlights-eastern-generation-gets-green-light-from-state-for-clean-energy-storage-in-astoria> (accessed December 3, 2023).

22 Eastern Generation LLC, "Posting of Completed Generator Deactivation Notice," *nyiso.com*, October 10, 2022, <https://www.nyiso.com/documents/20142/1403511/Posting-of-Completed-Generator-Deactivation-Notice-for-Astoria-GT1.pdf/ad5c51af-f74b-55a4-a256-cd0d02f080dc> (accessed December 3, 2023).



**Eastern Generation's Narrows peaker plant in Brooklyn.** PHOTO: UPROSE

## NEW YORK POWER AUTHORITY

The New York Power Authority (NYPA) is the largest state public power utility in the country. NYPA owns six peaker plants in New York City - Harlem River, Hell Gate, Joseph J. Seymour, Kent, Pouch, and Vernon Boulevard—and two peakers on Long Island—Flynn and Brentwood.

Because NYPA's peakers are relatively new and, compared to other peakers in the city, more efficient facilities, they are not subject to the Peaker Rule. However, in its VISION2030 plan released in 2020, NYPA committed to retire the utility's fossil power plants by 2035, five years before the Climate Act deadline of 2040.<sup>23</sup> This commitment led to a study exploring the feasibility of replacing NYPA's peaker plants with battery storage, which was conducted in consultation with the PEAK Coalition. The report, released in April 2022, found that each of NYPA's six gas peaker plants in New York City could be fully replaced with four-hour battery storage systems by 2030, aligning with the timeline laid out in "The Fossil Fuel End Game."<sup>24</sup>

In conjunction with the report's release, NYPA also issued a Request for Proposals to repurpose some of its peaker plant sites for the development of large-scale battery storage projects.<sup>25</sup> Governor Kathy Hochul included NYPA's clean energy transition in her proposed executive budget for fiscal year 2024.

23 New York Power Authority, "NYPA Approves New Strategic Plan to Provide Clean Energy Roadmap for Next Decade," Press Release, December 9, 2020, <https://www.nypa.gov/news/press-releases/2020/20201209-strategicplan> (accessed December 4, 2023).

24 New York Power Authority, "Small Clean Power Plant Adaptation Study," [nypa.gov](https://www.nypa.gov/-/media/nypa/documents/document-library/NYPA-SCPP-Adaptation-Study.pdf), April 2022, <https://www.nypa.gov/-/media/nypa/documents/document-library/NYPA-SCPP-Adaptation-Study.pdf> (accessed December 5, 2023).

25 New York Power Authority, "New York Power Authority Issues Solicitation for Battery Storage Proposals to Use Its Small Clean Power Plant Sites and Electrical Infrastructure," Press Release, April 21, 2022, <https://www.nypa.gov/news/press-releases/2022/20220421-battery> (accessed December 11, 2023).

“These findings support previous reports put out by PEAK—that battery storage could replace the operations of each individual NYPA peaker power plant in NYC, coupled with clean renewable energy sources on the grid, by 2030. While we await further analyses from NYISO and Con Edison regarding reliability/capacity questions, these findings invite a broader and bolder question: can clean renewable energy plus battery storage also replace all the City’s older, polluting private peaker plants? Can NYC become the first city in the nation to have all its peaker plants replaced? We believe we can—especially if we follow the visionary direction established by the New York State Climate Leadership and Community Protection Act.”

**EDDIE BAUTISTA**, EXECUTIVE DIRECTOR, NYC-EJA<sup>26</sup>

“Peak Coalition Statement on NYPA’s Small Clean Power Plant Adaptation Study,” April 21, 2022

In May 2023, New York passed legislation authorizing NYPA to develop and operate renewable generation and energy storage facilities, and directed NYPA to prepare a plan to phase out its peaker plants by 2030.<sup>27</sup> While the strategy and timeline for successfully transitioning NYPA’s peakers to clean resources is not entirely clear at this time and will ultimately be contingent on approval from NYISO, the public utility appears to be on the path to full replacement by 2030.



**NYPA’s Vernon Boulevard peaker plant in Queens.** DANIEL CHU/NYC-EJA

<sup>26</sup> PEAK Coalition, “Peak Coalition Statement on NYPA’s Small Clean Power Plant Adaptation Study,” [peakcoalition.org](https://peakcoalition.org), April 21, 2022, [https://f1096961-3dc3-44e4-b248-f2d10eb29a01.usrfiles.com/ugd/f10969\\_e3b33ffa5c604117990804ed61d6b17c.pdf](https://f1096961-3dc3-44e4-b248-f2d10eb29a01.usrfiles.com/ugd/f10969_e3b33ffa5c604117990804ed61d6b17c.pdf) (accessed December 11, 2023).

<sup>27</sup> New York Power Authority, “Governor Hochul Announces FY 2024 Budget Investments in Energy Affordability, Sustainable Buildings, and Clean Energy,” Press Release, May 3, 2023, <https://www.nypa.gov/news/press-releases/2023/20230503-budget> (accessed December 11, 2023).

## RISE LIGHT & POWER

Rise Light & Power is a wholly owned affiliate of LS Power, a development, investment, and operating company focused on the energy sector. Rise Light & Power operates one large peaker power plant, the Ravenswood Generating Station.

Ravenswood Generating Station is the state's largest fossil fuel power plant facility and includes multiple peaking units that date back to the 1960s. It is located right next to the Queensbridge Houses, the largest public housing project in North America. The site was initially home to more than 400 MW of gas combustion turbines, 69 MW of which were still providing peaking power in 2019. Those combustion turbines have now been fully retired. The site includes three large steam turbines, which remain in operation with a combined capacity of 1,827 MW.

Rise Light & Power is leading the Renewable Ravenswood initiative, a plan to transition Ravenswood Generating Station into a clean energy hub. The plan involves the replacement of Ravenswood's remaining peaking capacity with a mix of offshore wind, upstate renewables, district heating,<sup>28</sup> and large-scale battery storage.<sup>29</sup> In October 2023, the New York State Research and Development Authority (NYSERDA) announced the state's investment in 6,400 MW of renewable generation projects, including three



**Rise Light & Power's Ravenswood Generating Station in Queens.** SEBASTIAN BAEZ/UPROSE

28 A district heating system, also known as a heat network, involves the distribution of thermal energy for heating from a central source to consumers (residential, commercial, and industrial) through a network of underground pipes carrying steam or hot water.

29 Rise Light & Power, "A plan to turn the Ravenswood power plant into a clean energy hub," *Renewable Ravenswood*, 2023, <https://renewableravenswood.com/initiatives> (accessed December 12, 2023).

offshore wind developments.<sup>30</sup> The 1,404-MW Attentive Energy One project is being co-developed by Rise Light & Power and marks the first stage of implementing the Renewable Ravenswood plan. Once the project is underway to route power from the offshore wind farm to the Ravenswood site, Rise Light & Power intends to decommission one of the facility's large 400-MW gas turbines.

## CONSOLIDATED EDISON

Consolidated Edison (ConEd) is one of the country's largest investor-owned utilities, providing energy to 10 million people living in New York City and Westchester County. ConEd owns four peaker plant sites: 59th Street, 74th Street, East River, and Hudson Avenue.

ConEd submitted deactivation notifications to NYISO for its 74th Street and Hudson Avenue facilities, and, in compliance with the Peaker Rule, 70 MW of gas turbines at the two sites are no longer in operation. ConEd is involved in the development and interconnection of the Community Offshore Wind project included in NYSERDA's renewable investment announcement. According to a cost recovery order approved by the PSC, the interconnection of the offshore wind project will include demolition of the existing Hudson Avenue peaker plant.<sup>31</sup>

According to NYISO, ConEd's 37-MW 59th Street peaker plant will be in compliance with the Peaker Rule and therefore will be unavailable to provide peak power during the ozone season as of May 1, 2025. Whether this means that 59th Street will be completely retired by that time is unclear. Governor Hochul's 2023 transmission announcement also stated that completion of a new transmission line would result in the closure of the 59th Street peaker. The 200-MW East River Steam Turbine facility is not subject to the Peaker Rule. ConEd has not publicly indicated its transition plans for the East River power plant.



**ConEd's East River Generating Station in Manhattan.**

PHOTO: SEBASTIAN BAEZ/UPROSE

30 New York State Governor's Office, "America's Largest-Ever Investment in Renewable Energy is Moving Forward in New York," Press Release, October 24, 2023, <https://www.nyserdera.ny.gov/About/Newsroom/2023-Announcements/2023-10-24-Governor-Hochul-Announces-Nations-Largest-Ever-State-Investment> (accessed December 12, 2023).

31 State Of New York Public Service Commission, "Order Approving Cost Recovery For Clean Energy Hub," *documents.dps.ny.gov*, April 20, 2023, <https://www.nyserdera.ny.gov/-/media/Project/Nyserda/Files/Press-Releases/Order.pdf> (accessed December 12, 2023).

# Challenges Impeding the Transition

A clean energy transition is well underway in New York, but market barriers, regulatory obstacles, and other challenges have slowed progress and threaten the state's ability to meet its climate mandates. Inflationary pressures have led to calls for increased financial support from the state, and some large renewable projects are re-evaluating the feasibility of previously awarded contracts—most notably, large offshore wind projects planning to feed power directly into New York City and Long Island. Utilities and NYISO have raised concerns that clean alternatives are not being built at the pace needed to ensure that future demand for electricity will be reliably met as fossil power plants retire.

## RISING DEMAND

The electric power system will play a major role in decarbonizing other sectors of New York's energy system through the electrification of buildings and vehicles. Mass adoption of technologies like heat pumps will be needed to transition away from oil and gas for residential and commercial heating, while electric vehicles (EVs) from scooters to buses will steadily replace gas-powered transportation. All of this translates into significant new demands on the electric grid that will reshape when peak demand occurs, as winter heating eclipses summer cooling loads, and will likely increase the amount of resources needed to meet periods of in-city peak demand.

However, increased electrification also represents an opportunity to shift and shape demand in new ways. The timing of EV charging is often flexible, with most vehicles just sitting around most of the time. This creates an opportunity to shift charging to times when demand is lower and renewable generation is plentiful. Many high-power building loads, such as heating and cooling, can also be automatically adjusted to shift the majority of electricity demand to non-peak times while maintaining comfortable temperatures for occupants.

Utilities across the nation have begun to adopt programs to call on and incentivize commercial and residential customers to reduce demand during peak periods, or to discharge batteries to meet peak demand. These are known as demand response programs. ConEd currently administers both commercial and residential demand response programs, but these programs appear to have limited enrollment and likely only realize a small fraction of the demand flexibility represented by the city's buildings, which account for more than two-thirds of New York City's greenhouse gas emissions.<sup>32</sup> Electrification of heating systems greatly increases the potential to adjust building loads in response to peak periods of demand and periods of lower renewable generation.

Adjustable customer loads can also be combined with customer-sited solar, energy storage, and EV chargers to form virtual power plants. Virtual power plants are simply a bunch of customer resources

<sup>32</sup> Urban Green Council, "Explore NYC's building data," *urbangreencouncil.org*, 2023, <https://www.urbangreencouncil.org/what-we-do/exploring-nyc-building-data> (accessed December 12, 2023).



**Eastern Generation's Gowanus peaker plant in Brooklyn.** PHOTO: UPROSE

that can work together to respond to utility and grid signals by changing their behavior to either increase or decrease demand for grid electricity depending on the circumstances. When thousands of these loads are combined through third-party aggregators, they can provide the same services as traditional power plants. In 2019, the solar and storage company Sunrun successfully bid 20 MW of capacity to the New England grid operator with plans to harness the solar production and energy storage flexibility of 5,000 households across the region.<sup>33</sup> Unlike nearby states that have implemented statewide customer battery storage programs to meet peak demand, New York has yet to realize the important role that virtual power plants can play in reducing reliance on fossil peaker plants.<sup>34</sup>

**Unlike nearby states that have implemented statewide customer battery storage programs to meet peak demand, New York has yet to realize the important role that virtual power plants can play in reducing reliance on fossil peaker plants.**

## MAINTAINING RELIABILITY

Ensuring the reliability of the electric grid is a critical priority for the state's utilities and the grid operator, NYISO. For the grid, reliability means that there is enough electricity ready and available to serve customer needs at all times, which is no small task. There are legitimate concerns about the need to maintain grid reliability when transitioning resources, but, unfortunately, reliability is also being falsely raised as a scare tactic to slow the clean energy transition.

<sup>33</sup> Sun Run, "ISO New England Awards Sunrun Landmark Wholesale Capacity Contract," Press Release, February 7, 2019, <https://investors.sunrun.com/news-events/press-releases/detail/122/iso-new-england-awards-sunrun-landmark-wholesale-capacity> (accessed December 12, 2023).

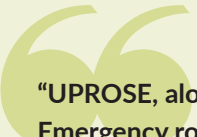
<sup>34</sup> Todd Olinsky-Paul, "Energy Storage Policy Best Practices from New England: Ten Lessons from Six States," *Clean Energy Group*, August 5, 2021, <https://www.cleanegroup.org/publication/energy-storage-policy-best-practices-from-new-england> (accessed December 12, 2023).



In its 2023 Quarter 2 Short-Term Assessment of Reliability (STAR) report, NYISO identified a potential reliability gap for the New York City area beginning in 2025.<sup>35</sup> According to NYISO, a significant reason for this gap is the unavailability of peaker combustion turbines due to compliance with DEC's Peaker Rule. When the rule fully takes effect in May 2025, NYISO estimates that the New York City region could experience a supply shortfall of up to 446 MW, meaning that under certain conditions electricity supply might not be able to reliably meet electricity demand.

The Peaker Rule allows for peakers to continue operating during ozone season for up to four years after this deadline if the power plant is needed for reliability purposes that cannot be met by alternative resources. In its Quarter 3 STAR report, NYISO stated that it would only opt to "temporarily retain peakers as a last resort."<sup>36</sup> In November 2023, NYISO indicated that neither ConEd nor the private sector proposed solutions that could come online before May 2025 and address the reliability shortfall.<sup>37</sup> Because of this, NYISO decided that the turbines at the Gowanus and Narrows peaker plants located in Sunset Park would need to operate for two years beyond the May 1, 2025, NOx emission deadline, which is disappointing and concerning because the Peaker Rule has been in place since 2019. The state, utilities, and grid operator have had ample time to prepare for this eventuality.

It is important to note that the potential reliability shortfall identified by NYISO is not an indication that clean alternatives, including renewables, storage, demand response, and efficiency, are not capable of fully replacing fossil peakers. What the gap indicates is that clean resources are not being developed at the necessary pace and in the right places to replace these dirty power plants. To date, the state has not done enough to prioritize the development of clean resources within New York City, where they are critically needed to meet local demand and displace fossil fuel power plants in environmental justice communities.



**"UPROSE, alongside the PEAK Coalition, is deeply concerned by the NYISO Reliability Report. Emergency rooms get full, and the work and school day is interrupted because of the health impacts our communities have suffered from peaker plant pollution for too long. The 2025 energy reliability gap highlights the urgent need for a swift transition to clean, equitable energy solutions like renewable generation and storage. We urge the state to act decisively in accelerating this transition and ensuring environmental justice for the most vulnerable."**

**ELIZABETH YEAMPIERRE**, EXECUTIVE DIRECTOR, UPROSE<sup>38</sup>

"PEAK Coalition Response to NYISO Reliability Report Findings," Press Release, November, 20, 2023

35 New York Independent System Operator, "Short-Term Assessment of Reliability:2023 Quarter 2," *nyiso.com*, July 14, 2023, <https://www.nyiso.com/documents/20142/16004172/2023-Q2-STAR-Report-Final.pdf> (accessed December 12, 2023).

36 New York Independent System Operator, "Short-Term Assessment of Reliability: 2023 Quarter 3," *nyiso.com*, October 13, 2023, <https://www.nyiso.com/documents/20142/39103148/2023-Q3-STAR-Report.pdf/836a011f-a2a8-2daf-bf5f-bf89ea79c2ff?t=1697223170004> (accessed December 12, 2023).

37 New York Independent System Operator, "Short-Term Reliability Process Report: 2025 Near-Term Reliability Need," *nyiso.com*, November 20, 2023, <https://www.nyiso.com/documents/20142/39103148/2023-Q2-Short-Term-Reliability-Process-Report.pdf> (accessed December 12, 2023).

38 PEAK Coalition, "PEAK Coalition Response to NYISO Reliability Report Findings," *peakcoalition.org*, November 20, 2023, [https://www.peakcoalition.org/\\_files/ugd/f10969\\_cf6b172b4ea740db808e6f1936d6153a.pdf](https://www.peakcoalition.org/_files/ugd/f10969_cf6b172b4ea740db808e6f1936d6153a.pdf) (accessed December 12, 2023).

Strategen’s analysis on behalf of the PEAK Coalition for “The Fossil Fuel End Game” found that all of New York City’s projected load growth and peak demand needs could be reliably met, hour-by-hour, with the right mix of renewables, short-duration battery storage, and efficiency. Transmission projects, such as ConEd’s Reliable Clean City projects that were announced since this analysis was completed, will further facilitate this transition by easing grid bottlenecks to allow more clean energy from outside the region to flow into New York City, thus reducing the need for in-city generation.<sup>39</sup> In-city demand response and customer resources bundled into virtual power plants can further reduce the stress of peak demand and decrease the need for fossil peaker plants. In preparation for increased levels of solar and wind generation, the state’s exploration of longer-duration energy storage resources, such as four demonstration projects recently awarded funding by NYSEDA, will identify the resources needed to fill intermittent periods of extended peak demand, such as during periods of extreme heat or cold or dips in renewable generation.<sup>40</sup>

**All of New York City’s projected load growth and peak demand needs could be reliably met, hour-by-hour, with the right mix of renewables, short-duration battery storage, and efficiency.**

## UNCERTAIN RENEWABLE ENERGY ECONOMICS

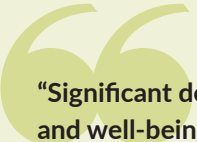
A key barrier to retiring New York City’s peaker plants while maintaining a reliable energy supply lies in recent delays in the development of renewable energy connecting to the five boroughs. The Covid-19 pandemic interrupted supply chains for many of the state’s major energy projects, such as transmission lines and offshore wind projects, that would reduce the reliance on polluting peaking resources. This interruption has been further exacerbated by Russia’s war in Ukraine, inflation, and rising interest rates, which have delayed the timeline for these resources to come online and increased the cost of developing renewable energy resources. As an example, in 2023, large-scale onshore and offshore for-profit renewable energy developers unsuccessfully submitted a petition to the PSC to increase state subsidies for already contracted projects, warning about the lack of financial viability and potential termination of development of certain projects.<sup>41</sup>

These unforeseen interruptions and economic uncertainties must be addressed by the state to ensure that fossil peaking resources are still able to retire on time or even ahead of schedule. While these and future uncertainties have the potential to increase ratepayer costs for renewable electricity, the “Dirty Energy, Big Money” report is a reminder that dependence on fracked gas and inefficient power plants continue to cost ratepayers hundreds of millions of dollars each year. Volatility in gas prices, partly due

39 Con Edison, “Reliable Clean City Projects,” *coned.com*, 2023, <https://www.coned.com/en/our-energy-future/our-energy-vision/where-we-are-going/reliable-clean-city-project> (accessed December 12, 2023).

40 Kavya Balaraman, “New York bets on long-duration energy storage with \$15M award to Form Energy, others,” *UtilityDive.com*, August 19, 2023, <https://www.utilitydive.com/news/new-york-long-duration-energy-storage-nyserda-form-energy/691322> (accessed December 12, 2023).

41 New York State Public Service Commission, “PSC Issues Decision to Preserve Competitive Renewable Energy Market and Protect Consumers,” Press Release, October 12, 2023, <https://dps.ny.gov/system/files/documents/2023/10/pr23105.pdf> (accessed December 12, 2023).



**“Significant delays for critical renewable energy projects disproportionately impact the health and well-being of communities suffering from fossil fuel power generation. More years of poor air quality will only exacerbate poor health outcomes for Black and Brown communities, and other communities of color. It is also a lost opportunity for a Just Transition for places like Sunset Park and Hunts Point, where offshore wind projects may be a transformative opportunity to ensure that communities most impacted by pollution can grow and flourish under a new green re-industrialization.”**

**THE POINT CDC, UPROSE, AND NYC-EJA**

“Statement on Renewable Energy Contract Prices,” October 12, 2023<sup>42</sup>

to the war in Ukraine, has only increased the cost of electricity from peakers and heating from fracked gas.<sup>43</sup> Instead of acting as a deterrent, these factors should motivate increased investment and a faster and more extensive build out of renewable energy to reduce the elevated economic costs of continued reliance on fossil fuels, and to halt the major public health costs of polluting peaker plants.

## REGULATORY BARRIERS

Developing clean energy alternatives to replace fossil peaking capacity in New York City is not without its challenges. In addition to limited space for large-scale renewable energy and energy storage development within the city, New York City has some of the strictest building codes and zoning regulations in the country. These stringent regulations add cost and complexity to the development of solar and energy storage and the implementation of building efficiency measures. Fire department setback and clearance requirements limit the availability of rooftop space for solar panels, and energy storage fire code regulations continue to prevent lithium-ion batteries from being installed indoors, severely curtailing commercial storage development. New York has also passed legislation banning the second use of lithium-ion batteries. Although this comes amidst valid concerns about fires caused by e-mobility devices in recent years, the broad legislation could make some utility-scale battery storage more costly. There remain significant challenges in educating both the public and policymakers on the differences between various battery storage devices and applications, and the necessity of energy storage for the city’s electric grid.

Because of the higher development costs associated with installing solar and energy storage in the city, and a lack of sufficient market incentives to fully offset these expenses, in-city buildout of clean energy resources in New York City has lagged the rest of the state. City and state officials must increase efforts to identify regulatory and market barriers impeding the development of clean alternatives in coordination

42 New York City Environmental Justice Alliance, UPROSE, and The POINT CDC, “Statement on Renewable Energy Contract Prices,” *nyc-eja.org*, October 12, 2023, [https://nyc-eja.org/wp-content/uploads/2023/10/NYCEJA-Statement\\_PSC-Renewable-Energy-Award-Adjustments\\_Oct-2023.pdf](https://nyc-eja.org/wp-content/uploads/2023/10/NYCEJA-Statement_PSC-Renewable-Energy-Award-Adjustments_Oct-2023.pdf) (accessed December 12, 2023).

43 Elizabeth Yeampierre, Justin Wood and Daniel Chu, “Opinion: To Bring Down Energy Bills, NY Must Invest in Clean Energy Production,” *citylimits.org*, March 3, 2022, <https://citylimits.org/2022/03/03/opinion-to-bring-down-energy-bills-ny-must-invest-in-clean-energy-production> (accessed December 12, 2023).

with NYISO, electric utilities, clean energy industry representatives, advocates, and community members. These stakeholders will need to work together to lessen the burden of unnecessary zoning, permitting, siting, and interconnection requirements and expenses to streamline and accelerate clean energy development processes. New York City Council approved a “City of Yes for Carbon Neutrality” zoning proposal, which is designed to update regulations and ease some of these barriers.<sup>44</sup> The zoning text amendment will enable more solar and energy storage to be developed across the city with fewer land use barriers than before. Members of the PEAK Coalition are continuing to urge all relevant agencies to remove regulatory barriers and address perceived safety concerns.

California presents a good case study for the role of regulatory and market reform to advance clean energy. Recognizing the critical role of energy storage to enable a cleaner and more efficient and reliable grid, California policymakers and regulators enacted measures to streamline energy storage siting, permitting, and interconnection processes and to develop new market mechanisms that better recognize the value that storage can deliver to the grid and utility customers. Over a four-year period, the state was able to dramatically ramp up energy storage development, installing nearly 6,000 MW of energy storage and increasing California’s total battery storage capacity by more than sevenfold.<sup>45</sup>



**Rise Light & Power’s Ravenswood Generating Station in Queens.** PHOTO: SEBASTIAN BAEZ/UPROSE

44 New York City Department of Planning, “City of Yes for Carbon Neutrality,” *nyc.gov*, 2023, <https://www.nyc.gov/site/planning/plans/city-of-yes/city-of-yes-carbon-neutrality.page> (accessed December 12, 2023).

45 California Office of Governor Gavin Newsom, “California Reaches Energy Storage Milestone,” Press Release, October 24, 2023, <https://www.gov.ca.gov/2023/10/24/california-reaches-energy-storage-milestone> (accessed December 12, 2023).

## FALSE SOLUTIONS

Lastly, misguided support for polluting false solutions, such as burning blue or green hydrogen and RNG in power plants, has served as an unnecessary distraction that threatens the state’s ability to achieve its emissions goals mandated by the Climate Act.<sup>46</sup>

Multiple attempts have been and continue to be made to redefine the meaning of “zero-emission” in the Climate Act. These efforts have primarily been led by fossil fuel interests.

**Misguided support for polluting false solutions, such as burning blue or green hydrogen and RNG in power plants, has served as an unnecessary distraction that threatens the state’s ability to achieve its emissions goals mandated by the Climate Act.**

Bills introduced during the 2021–2022 and 2023–2024 legislative sessions attempting to limit the definition of zero-emissions to only refer

to greenhouse gasses, ignoring the severe harm of co-pollutants on surrounding communities.<sup>47</sup>

The proposed legislation would also alter the Climate Law definition to only consider emissions at the point of electricity generation, ignoring all upstream emissions such as methane leakage during the production of blue hydrogen from fracked gas. Fortunately, the bills have not yet progressed beyond the consideration stage.

However, at the request of the Independent Power Producers of New York, a trade group representing owners of the state’s fossil fuel power plants, the PSC has initiated a process to “examine the need for resources to ensure the reliability of the 2040 zero-emissions electric grid mandated by the Climate Leadership and Community Protection Act” and is seeking input on how to define zero-emissions, including whether the definition should include green hydrogen.<sup>48</sup> While green hydrogen production and combustion can theoretically be managed without greenhouse gas emissions, burning any color of hydrogen results in high levels of NOx emissions<sup>49</sup> and hydrogen itself is a potent indirect greenhouse gas.<sup>50</sup>

In 2022, NYPA worked with industry groups to pilot green hydrogen blending and combustion at its Brentwood peaker plant on Long Island. The demonstration confirmed that burning hydrogen increased the NOx emissions of the power plant, emitting NOx at rates up to 24 percent higher than burning fracked gas without hydrogen.<sup>51</sup> Additionally, a 35 percent hydrogen blend with gas only resulted in a 14 percent reduction in carbon emissions—hardly a roadmap for decarbonization and much less

46 Blue hydrogen is hydrogen produced from fracked gas, steam, and water in a process that produces carbon dioxide as a by-product. Green hydrogen is hydrogen produced from water in a process of electrolysis and renewable energy sources that produces oxygen as a by-product.

47 New York State Assembly, “A08094: Establishes a program for eligible zero emissions energy systems,” [nyassembly.gov/leg](https://legislation.nysenate.gov/pdf/bills/2021/A8094), 2021-2022 Assembly, <https://legislation.nysenate.gov/pdf/bills/2021/A8094> (accessed December 12, 2023).

48 New York State Public Service Commission, “PSC Announces Initiative to Leverage New Clean Energy Technologies for a Zero-Emissions Electric Grid,” Press Release, May 18, 2023, <https://dps.ny.gov/system/files/documents/2023/05/pr23052.pdf> (accessed December 12, 2023).

49 Clean Energy Group, “Hydrogen Areas of Concern,” [cleanenergygroup.org](https://www.cleanenergygroup.org/initiatives/hydrogen/areas-of-concern), <https://www.cleanenergygroup.org/initiatives/hydrogen/areas-of-concern> (accessed December 12, 2023).

50 Abbe Ramanan, “Hydrogen’s Global Warming Impacts,” [cleanenergygroup.org](https://www.cleanenergygroup.org/publication/hydrogens-global-warming-impacts), November 2, 2023, <https://www.cleanenergygroup.org/publication/hydrogens-global-warming-impacts> (accessed December 12, 2023).

51 EPRI, “Executive Summary: Hydrogen Cofiring Demonstration at New York Power Authority’s Brentwood Site: GE LM6000 Gas Turbine,” [epri.com](https://www.epri.com/research/products/00000003002025166), September 15, 2022, <https://www.epri.com/research/products/00000003002025166> (accessed December 12, 2023).

ambitious than the zero-emission grid required by the Climate Act. NYPA has shown no interest in pursuing any additional hydrogen combustion projects beyond this brief demonstration.

While these false solutions have yet to take hold in New York, fossil fuel interests and legacy power plant and pipeline owners continue to push for ways to continue operating existing infrastructure and perpetuate reliance on fossil fuels. These efforts run counter to the intent of the Climate Law and will only serve to delay New York's clean energy transition, subjecting environmental justice communities to continued and prolonged exposure to toxic emissions.

**Fossil fuel interests and legacy power plant and pipeline owners continue to push for ways to continue operating existing infrastructure and perpetuate reliance on fossil fuels.**



**Child playing basketball in proximity to Ravenswood Generating Station in Queens.**

PHOTO: SEBASTIAN BAEZ/UPROSE

# Path Forward

The phaseout of fossil fuel peaker plants creates new opportunities for communities to take back control over their future. The transition from traditional power plants to renewable energy and energy storage technologies represents a paradigm shift in New York’s energy landscape. This is also a unique opportunity for energy and environmental justice communities to empower themselves, foster economic transition, and improve local resilience.

## ENVISIONING A JUST TRANSITION

A strategic transition to renewable energy and battery storage resources can accompany an increase in sustainable careers and local wealth. Workforce retraining and career development programs will create a new corps of people to participate in the thousands of necessary and quality opportunities in places formerly burdened by peaker plants, places like Astoria, Queens, where peaker plants are sited amongst the largest public housing development in the country and other low-and-middle income residents. This



**Boogie Down Bronx community event.** PHOTO: JOANNA GARCIA/FREELANCE PHOTOGRAPHER

can already be seen in Astoria, where Rise Light & Power, the owner-operator of Ravenswood Generating Station, has committed to retain and retrain the unionized workforce on site in its entirety. Represented by Utility Workers Union of America (UWUA) Local 1-2, skilled tradespeople have been instrumental leaders alongside the local community in advocating for the energy transition.

Proactive investments in these programs will safeguard the existing unionized workforce at power plants, grow a new generation of workers for the clean energy industry, and position previously burdened communities at the forefront of building and benefiting from an energy transition. Construction and maintenance of these new facilities can also provide a steady stream of opportunities that foster a more resilient and diverse local economy.

Although communities most burdened by peaker operations should not bear the brunt of the cost in the energy transition, what environmental justice communities can and are doing is leading the way in mitigating the impacts of climate change out of necessity and vision. Integrating with new and advanced technologies, such as community solar and battery storage, can show that these communities are capable of building and maintaining future decentralized and democratic energy systems, where infrastructure can also be community-led and community-owned.

**Although communities most burdened by peaker operations should not bear the brunt of the cost in the energy transition, what environmental justice communities can and are doing is leading the way in mitigating the impacts of climate change out of necessity and vision.**

Following and adapting from Principles of Energy Democracy framework<sup>52</sup> developed by Climate Justice Alliance and Center for Earth, Energy, and Democracy, a just transition for peaker power plants must

1. Center the transition process as a vehicle for economic justice and human rights
2. Respect local communities' self-determination in the future of phased-out peakers
3. Ensure universal energy access and affordability
4. Provide career opportunities at every level
5. Pursue responsible use of energy resources without false solutions
6. Allow community governance in renewable energy and battery storage
7. Foster energy reliability and resiliency
8. Remediate relationships with historically impacted communities
9. Foster community and intergenerational wealth building
10. Repair relationships with ecosystems and nature

<sup>52</sup> Center for Earth, Energy and Democracy and the CJA Energy Democracy Working Group, "Ten Principles for Energy Democracy," [climatejusticealliance.org](https://climatejusticealliance.org), July 2023, [https://climatejusticealliance.org/wp-content/uploads/2023/07/CJA\\_EnergyDemPrinciples1\\_4pg\\_bleeds\\_F.pdf](https://climatejusticealliance.org/wp-content/uploads/2023/07/CJA_EnergyDemPrinciples1_4pg_bleeds_F.pdf) (accessed December 12, 2023).



## ROADMAP TO SUCCESS

New York City's effort to retire peaker plants needs to strategically balance between energy demand, community priorities, regulatory challenges, and renewable energy and energy storage development.

Accounting for all of these factors may be daunting, but there is a plethora of actionable items that the PEAK Coalition has identified actionable items that different stakeholders, from the Governor's office to municipal authorities and the private sector, should pursue in order to accelerate the shutdown and transition of peaker plants.

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The most immediate and pressing step is to address the short-term reliability challenges that led NYISO to issue reliability must-run scenarios for the Gowanus and Narrows peaker plants. Governor Hochul must direct key decision-makers to fund and develop transmission and energy storage assets before May 2025 in order to minimize or eliminate the use of these peaker plants. The Peaker Rule, passed in 2019, provided plenty of time for ConEd and other stakeholders to come up with responsible solutions that would reduce emissions before the scheduled compliance date in 2025. Now the impetus is to reduce the harm a reliability challenge can produce.

The New York State legislature should also deliberate and pass legislation to unlock the state's full potential in transitioning peaker assets. The Just Energy Transition Act,<sup>53</sup> the Pollution Justice Act,<sup>54</sup> and other relevant and necessary legislation to study, fund, and develop solutions that would proactively transition peaker plants without energy reliability or ratepayer concerns. The legislature and Governor passed elements of the Build Public Renewables Act<sup>55</sup> in 2023, which enabled NYPA to develop renewables for the first time. NYPA must be held accountable for the linked mandate to phase out their peaker plants in New York City and Long Island by accelerating the process of issuing, evaluating, awarding, and developing battery storage projects at the sites. The technical feasibility of this has already been confirmed by NYPA's own study. Now is the time to put the plan into action. NYPA must also develop an ambitious strategic plan for their roadmap to begin owning, developing, and operating solar, onshore wind, and offshore wind assets across New York State.

State agencies must also pick up efforts to phase out peaker plants responsibly. NYSERDA should continue its work with the interagency Low Income Energy Task Force<sup>56</sup> and the Energy Equity

53 New York State Senate, "Senate Bill S2935C: Enacts the "just energy transition act," 2023-2024 Legislative Session, <https://www.nysenate.gov/legislation/bills/2023/S2935/amendment/C> (accessed December 12, 2023).

54 New York State Senate, "Senate Bill S4378B: Relates to establishing the "pollution justice act of 2022," 2021-2022 Legislative Session, <https://www.nysenate.gov/legislation/bills/2021/S4378> (accessed December 12, 2023).

55 New York State Senate, "Senate Bill S6453C: Implements the "New York State Build Public Renewables Act," 2021-2022 Legislative Session, <https://www.nysenate.gov/legislation/bills/2021/S6453> (accessed December 12, 2023).

56 New York State Energy Research and Development Authority, "Low-Income Forum on Energy (LIFE)," [nyserda.ny.gov](https://www.nyserda.ny.gov/All-Programs/Low-Income-Forum-on-Energy), 2023, <https://www.nyserda.ny.gov/All-Programs/Low-Income-Forum-on-Energy> (accessed December 12, 2023).



**East River Energy Storage Project being built at the former site of the Charles Poletti power plant in Astoria, Queens.** PHOTO: SEBASTIAN BAEZ/UPROSE

Collaborative<sup>57</sup> to maintain energy affordability and prioritize clean energy program development for disadvantaged communities. NYSERDA can and must develop new large-scale and community-led renewable energy and energy storage projects in an expedient manner and prioritize applications that will transition fossil fuel operations or develop distributed energy resources capacity. The PSC, in its initiative to define zero-emissions energy sources compliant with the mandate for 100 percent emissions-free energy by 2040, must exclude energy generation sources that have adverse climate and public health impacts. Ruling out false solutions, such as hydrogen combustion, is critical to focus New York on the right track for its energy future. The PSC should push regulated entities, such as ConEdison and National Grid, to expand their efforts to combat climate change and reduce peaker plant utilization.

**The PSC should push regulated entities, such as ConEdison and National Grid, to expand their efforts to combat climate change and reduce peaker plant utilization.**

Outside of the New York State government, utilities and municipal governments must do their part in the just transition. Municipal governments must reduce energy consumption from government operations and liaise with statewide entities to build momentum for shutting down peaker plants. Local leaders can play a significant role in educating the public on issues such as developing responsible solutions to address safety concerns without overburdening renewable energy and battery storage development due to misinformation.

57 New York State Energy Research and Development Authority, "Energy Equity Collaborative," [nyserd.org, 2023, https://www.nyserd.org/All-Programs/Energy-and-Climate-Equity-Strategy/Energy-Equity-Collaborative](https://www.nyserd.org/All-Programs/Energy-and-Climate-Equity-Strategy/Energy-Equity-Collaborative) (accessed December 12, 2023).

New York City's Local Law 97 implementation process must be paired with significant resources and funding for energy efficiency retrofits in order to manage expected growth in energy demand due to electrification.<sup>58</sup> Regulated utilities can scale demand response efforts more effectively by initiating opt-out demand response programs rather than relying on individual households and businesses to proactively tackle climate change. Scaled-up demand response programs have already seen significant successes in places like California, where the strained energy grid prevented blackouts and brownouts through its demand reduction efforts during peak hours.<sup>59</sup> A universal demand response system in New York City is a necessary and effective pathway to reduce peaker utilization that can be quickly implemented to address near-term issues such as the 2025 reliability challenge identified by NYISO.

**Much more can and should be done to advance energy democracy, a just transition, and environmental justice in communities that have been deliberately harmed by fossil fuels for many decades.**

This section only addresses some actionable recommendations that key decision-makers must make in order to build towards phasing out peaker power plants. Much more can and should be done to advance energy democracy, a just transition, and environmental justice in communities that have been deliberately harmed by fossil fuels for many decades.



**Eastern Generation's Astoria Steam Turbine Generating Station in Queens.** PHOTO: SEBASTIAN BAEZ/UPROSE

58 NYC Sustainable Buildings, "Local Law 97," *nyc.gov*, 2023, <https://www.nyc.gov/site/sustainablebuildings/1197/local-law-97.page> (accessed December 12, 2023).

59 Jeff St. John, "Californians saved the grid again. They should be paid more for it," *Canary Media*, September 15, 2022, <https://www.canarymedia.com/articles/grid-edge/californians-saved-the-grid-again-they-should-be-paid-more-for-it> (accessed December 12, 2023).



**NYPA's Vernon Boulevard peaker plant in Queens.** PHOTO: UPROSE

## Conclusion

**T**here has been progress in shutting down New York City's most polluting peaker plants. But the progress made has been too little and too slow. Only about 10 percent of the city's fossil fuel peaking capacity has been fully decommissioned over the past four years and announced retirement plans are in jeopardy as the pace of clean energy development has lagged and peakers are being kept online to address potential reliability concerns. The state, the city, the grid operator, utilities, and the energy industry must do more to accelerate this transition now and fulfill the requirements mandated by the Climate Law and Peaker Rule.

The clean energy transition does not mean sacrificing the reliability of the electric grid, and ensuring the reliability of the grid should not mean sacrificing the health and well-being of New Yorkers. The pace of renewable energy, energy storage, and transmission development must increase. Utilities and building owners must embrace new ways to reduce and shift demand away from peak periods. Fossil peaker plants impacting the lives of hundreds of thousands of low-income people of color must be closed as soon as possible. Not another life should be needlessly cut short due to poor planning and unnecessary delays in the transition to a clean energy future.

**The clean energy transition does not mean sacrificing the reliability of the electric grid, and ensuring the reliability of the grid should not mean sacrificing the health and well-being of New Yorkers.**

## ABOUT THE PEAK COALITION MEMBERS



**CLEAN ENERGY GROUP (CEG)** is a national nonprofit working to provide innovative technical, economic, and policy solutions to enable communities to participate equitably in the clean energy transition and help ensure affordable,

reliable clean energy for all. CEG is a leading advocate for energy storage, renewable generation, demand response, and other clean alternatives to replace fossil fuel power plants, working in collaboration with the communities impacted by toxic power plant emissions to raise awareness of disproportionate harms and accelerate community-led transitions. For the past decade, CEG has been facilitating solar and battery storage development in historically marginalized communities, supporting more than 300 solar and storage projects in a hundred communities across the country and advancing equitable state storage and renewable policies and programs. [www.cleanegroup.org](http://www.cleanegroup.org)

# NYLPI

## JUSTICE THROUGH COMMUNITY POWER

**NEW YORK LAWYERS FOR THE PUBLIC INTEREST (NYLPI)**

is a nonprofit civil rights law firm committed to advancing equality and civil rights through community lawyering and partnerships with the private bar. NYLPI has used its legal and policy expertise in tandem with organizing and community partnerships for over two decades to address disproportionate environmental burdens in New York City's low-

income communities of color. NYLPI represented UPROSE in a challenge to the development and siting of new peaker plants in the early 2000s, and in 2010 and 2011 worked closely with NYC-EJA to revise New York law to help protect low-income communities and communities of color from being disproportionately burdened by the impacts of new power generating facilities. Since 2016, NYLPI has supported community renewable energy project developments in environmental justice communities and has advocated for equity in state and local energy policy. [www.nylpi.org](http://www.nylpi.org)



The **NEW YORK CITY ENVIRONMENTAL JUSTICE**

**ALLIANCE (NYC-EJA)** is a nonprofit citywide network linking grassroots organizations from low-income communities of color in their struggle for environmental justice. NYC-EJA integrates groundbreaking research, robust campaigns, and technical assistance for its members and allies. In this capacity, NYC-EJA is immersed in energy related advocacy and planning, providing support to the local struggles of its members who are advocating for the displacement of polluting infrastructure from their communities while concurrently developing

renewable energy opportunities that optimize local health and economic benefits. NYC-EJA is committed to advancing energy resilience and just transitions in the energy sector through leadership in power building efforts at both City and State levels, and engagement in existing initiatives such as New York's Reforming the Energy Vision and New York City's 80x50 and PlaNYC goals. In June 2019, NYC-EJA as a leader in the NY Renew coalition pushed New York State to pass ambitious and historic legislation to drastically cut its greenhouse gas emissions economy-wide by 2050, including a zero emissions target for the electricity sector. [www.nyc-eja.org](http://www.nyc-eja.org)



**THE POINT CDC** is dedicated to youth development and the cultural and economic revitalization of the Hunts Point Peninsula of the South Bronx. After Superstorm Sandy, THE POINT mobilized elected officials, businesses, labor groups, and local residents to inform the creation of the Hunts Point Lifelines Plan focused on building climate resilience. This input led Lifelines to receive a \$20 million Rebuild by Design award from HUD and \$25 million from the City towards the development of renewable, resilient energy systems and stormwater management infrastructure in Hunts Point.

Additionally, THE POINT is currently in the pre-development stage for what will be one of the largest community solar projects in New York State with support from New York State Energy Research Development Authority (NYSERDA). [www.thepoint.org](http://www.thepoint.org)



**UPROSE**, founded in 1966, is Brooklyn's oldest Latino community-based organization located in Sunset Park. UPROSE is an intergenerational, multi-racial, WOC-led

community organization working at the intersection of racial justice and climate change through community organizing, education, indigenous and youth leadership development, and cultural/artistic expression. In the aftermath of Superstorm Sandy, UPROSE has established the Sunset Park Climate Justice Center, focused on engaging community residents and businesses to generate grassroots led climate adaptation and community resiliency planning. For a quarter century, UPROSE has been engaged in advocacy around the siting and deployment of polluting power plants and the development of alternatives. UPROSE is currently developing New York City's first community owned solar project. UPROSE is a Steering Committee member of New York Renews—a statewide coalition of over 200 organizations that help pass the Climate Leadership and Community Protection Act in 2019, and the national Climate Justice Alliance—a coalition of over 70 urban and rural frontline organizations across the nation building a Just Transition. [www.uprose.org](http://www.uprose.org)

# ACCELERATE NOW!

## THE FOSSIL FUEL END GAME 2.0

The PEAK Coalition—UPROSE, THE POINT CDC, New York City Environmental Justice Alliance (NYC-EJA), New York Lawyers for the Public Interest (NYLPI), and Clean Energy Group (CEG)—has come together to end the long-standing pollution burden from power plants on the city's most climate-vulnerable people. This Coalition will lead the first comprehensive effort in the US to reduce the negative and racially disproportionate health impacts of a city's peaker plants by replacing them with renewable energy and storage solutions. Our collaboration brings technical, legal, public health, and planning expertise to support organizing and advocacy led by communities harmed by peaker plant emissions. Together with communities, we are advocating for a system of localized renewable energy generation and battery storage to replace peaker plants, reduce greenhouse gas (GHG) emissions, lower energy bills and make the electricity system more resilient in the face of increased storms and climate impacts.

More information about the PEAK Coalition can be found here:

[www.peakcoalition.org](http://www.peakcoalition.org)



PHOTO: SEBASTIAN BAEZ/UPROSE