



PEAK Coalition
Statement on NYISO's Q2 STAR Report
July 14, 2023

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 the long-standing pollution burden from power plants on the city's most climate-vulnerable people. This coalition is 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.

PEAK Coalition is gravely concerned with the impact that the reliability deficit estimated in the Short Term Assessment of Reliability (STAR) report for Q2 of 2023 released by the New York Independent Systems Operator (NYISO) will have on communities that live near power plants. We encourage all stakeholders involved in the energy planning process to take concrete action to prevent delaying the closure of fossil fuel peaker plants in 2025 and beyond. These plants harm the communities that surround them every hour that they operate. PEAK refuses to accept a scenario in which environmental justice communities must suffer further harm to guarantee further profligate summertime energy consumption in commercial buildings and wealthy communities.

NYISO's July 2023 quarterly assessment of the reliability of the bulk electric system for the period of April 15, 2023, through April 15, 2028, found a deficit in reliability margins for the New York City area beginning in the summer of 2025. The estimated deficit ranges from 306 MW to 446 MW. Cited factors driving this reliability need include more severe extreme summer heat, increased electrification of the transportation and building sectors, continued economic growth, and unavailability or retirement of fossil fuel generators.

In order to resolve the estimated reliability gap, Con Edison, New York Power Authority, and other electricity market participants must propose solutions including but not limited to aggressive demand response, transmission development, energy efficiency, and renewable energy and storage deployment that can address the short-term supply challenge. Without adequate solutions being put into the electricity supply pipeline *immediately*, fossil fuel power plants, especially peaker plants slated to comply with New York State's Nitrogen Oxide Emissions Rule ("Peaker Rule") that came into effect this year, may be forced into a 2-year operation extension to prevent blackouts and brownouts. Such extensions will continue to unduly burden environmental justice communities and perpetuate high electric capacity payments from all New Yorkers. The Peaker Rule was issued to remove the legacy environmental harms in environmental justice communities and has resulted in the pursuit of deactivation by some of the city's oldest and dirtiest peaker plants, allowing these sites to be redeveloped for energy storage and offshore wind infrastructure.

NYISO can and must better model solutions that will address the supply deficit, including firmer and more aggressive renewable energy and storage deployment timelines, aggressive demand response program expansion, and adequate non-wires solutions from utilities.

PEAK Coalition calls on the New York State government and all relevant utilities and authorities to utilize their full power to accelerate the development of emissions-free solutions to address upcoming reliability concerns. Any action by New York State must comply with the Climate Leadership and Community Protection Act, especially the mandate in section 7(3) to not disproportionately burden and to prioritize emissions reductions in Disadvantaged Communities (“DACs”), and a minimum of 35-40% of energy investments going into these communities. With NYPA’s new authority to rapidly build renewable energy resources and increased federal funding for clean energy development, the time and opportunity is now to get a head start on New York’s 70% renewable energy by 2030 and emissions-free grid by 2040 mandates. **If NYISO is forced to issue reliability-must-run orders, New Yorkers will know that electric utilities and state governments willingly failed to act to protect communities most impacted by fossil fuel emissions and climate change.** Energy reliability must not come at the expense of environmental justice communities who have already shouldered this burden at the expense of their health and neighborhoods.

New York State Energy Research and Development Authority, New York State Department of Environmental Conservation, Consolidated Edison, and all relevant agencies and authorities must take immediate and concrete action to bolster New York City’s energy reliability with emissions-free solutions and prioritize protections for Disadvantaged Communities.

*“As the impacts of the climate crisis grow, it is imperative that we protect the frontline communities from fossil fuel plants that have been negatively impacting the health of Sunset Park residents for decades. We cannot expect frontline communities to shoulder both extreme heat and flooding as well as the air pollution from peaker plants. PEAK and our allies have proven that we have the solutions at our fingertips to retire peaker plants AND maintain our grid’s reliability. We are deeply disappointed **with the pace and inability** of our state’s energy leaders to address a climate emergency **and the never-ending dilatory tactics that block operational solutions and fail to prioritize the health** and well-being of frontline communities.”*

- **Elizabeth Yeampierre**, Executive Director of UPROSE and a member of the PEAK Coalition.

“NYISO has a directive to keep the grid stable and ‘keep the lights on,’ but this report shows we are willing to sacrifice the health and stability of vulnerable communities to ensure business continues as usual. It is disappointing that NYISO would model solutions that prioritize market needs over native New Yorkers. Ask any parent if they would rather have blackouts or permanent disability risks for their children, and they will take blackouts every time. Continued use of peakers hampers the physical and economic development of both Environmental Justice communities and the state at large. There is no long-term economic growth for New York without the growth and encouragement of renewable technologies. The longer we allow for the use of these outdated technologies, the more legitimacy we lend them.”

- **Victor Davila**, a Community Organizer with The POINT CDC and a member of the PEAK Coalition.

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