



**PEAK Coalition**  
**NEW YORK CITY COUNCIL TESTIMONY**  
**Committee on Environmental Protection**  
**October 13, 2022**

*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.*

**The PEAK Coalition strongly supports the bills and resolutions being considered today—Int 315, Int 330, Res 169, and Res 189—which are critical steps in accelerating the city's progress toward a just energy transition. We also call on the council to make necessary amendments to Int 315 to clearly define renewable energy, incorporate battery storage solutions into this study, and empower city agencies to take rapid action based on the results of this study.**

The New York City government has not even met half of its 2025 solar and storage development targets. The city is also dragging its feet to phase out our reliance on fossil fuels, putting us on a pathway to fail the state-mandated emissions-free energy grid by 2040.

Intro 315 bill does not specify what types of renewable energy the city will study, which leaves a big loophole for fossil fuel interests to slip in false solutions<sup>1</sup> such as hydrogen combustion into this study, technologies that although don't produce carbon dioxide (CO<sub>2</sub>), are expensive and emit more nitrogen oxides (NO<sub>x</sub>) emissions than burning fossil fuels. This bill should adopt the same definition of renewable energy as Section 66-p of the State Public Service Law, which does not include hydrogen combustion.

Understanding the viability of using stranded properties, including brownfields, for renewable energy development can benefit disadvantaged and other Environmental Justice communities by prioritizing a rapid phasing out of fossil fuel combustion, which severely harms public health and is a major contributor to greenhouse gas emissions. PEAK has conducted and published extensive research on the benefits of co-siting renewable energy generation and battery storage, a method that ensures critical resource reliability and reduces fossil fuel combustion in power plants during peak hours of energy demand. PEAK has also collaborated with the New York Power Authority over the past few years to study and confirm the feasibility of rapidly transitioning NYPA's fossil fuel peaker plants to battery storage alone. Incorporating battery storage into this study will ensure that we can meet city and states' storage targets, and improve the resiliency of distributed generation systems.

PEAK further urges the Council to require this report be made public and clearly communicated with communities near sites where renewable energy and storage developments are found to be feasible and suitable, especially on sites that are not feasible for affordable housing

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<sup>1</sup>[New York Renews. False Solutions. 2021.](#)

development. Energy Democracy<sup>2</sup> is a core component of a Just Transition, and we must ensure that energy planning is no longer done in the backrooms of government and regulated utilities. The people have the right to scrutinize and call for a responsible, accountable, and rapid transition process in line with the laws that constitute the Climate Mobilization Act, as well as the Climate Leadership and Community Protection Act (CLCPA).

Finally, we ask the City Council to take urgent action on the results of this study, including requiring the Department of Citywide Administrative Services to hold public hearings or open comments regarding this report, followed by procurement for renewable energy and storage development within weeks after the delivery of this report and to take advantage of benefits and take advantage of opportunities for cities to realize their climate goals and mandates through funding made available by the Infrastructure Investment & Jobs Act and the Inflation Reduction Act.

Additionally, PEAK encourages this committee to pass the bill regarding geothermal siting and Resolution 169 on a Climate Plan to Protect New York. Moreover, PEAK also endorses Res 189 regarding the Build Public Renewables Act, which we strongly support as an additional pathway to retire NYPA's fossil fuel peaker plants and accelerate the development of renewable energy and storage across New York State.

**With necessary amendments to this bill, New York City can affirm itself as a global leader in the transition to clean, affordable energy and can achieve the mandates of CLCPA.**

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<sup>2</sup> <https://climatejusticealliance.org/workgroup/energy-democracy/>