

EJLPC Urges New York to Fully Evaluate Bulk Transmission Before Committing Ratepayers to Costly Grid Investments

Filing warns inadequate transmission planning could increase electricity costs and keep aging, polluting downstate power plants online longer

NEW YORK, NY, UNITED STATES,
September 15, 2026 /

EINPresswire.com/ -- NEW YORK -

September 15, 2026 - The Energy Justice Law and Policy Center ([EJLPC](#)), a member of New York's Energy Policy Planning Advisory Committee (EPPAC),

is calling on the New York Public Service Commission to require a fuller evaluation of bulk transmission alternatives before the state commits to major new grid investments that could affect electricity costs, reliability, and the retirement of aging fossil-fuel power plants.



Grid Operations

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Before billions of dollars are committed, NY should compare transmission options fully and fairly - on cost, reliability, public health, and their ability to help retire polluting power plants.”

Raya Salter, Esq., ED of EJLPC

In [comments](#) filed with the Commission last week, EJLPC argues that New York's Coordinated Grid Planning Process does not adequately compare local transmission projects with larger bulk transmission solutions. The organization is urging the Commission to direct the New York Independent System Operator (NYISO) to solicit and evaluate bulk transmission alternatives through the state's Public Policy Transmission Needs process.

[This companion op-ed](#) by Raya Salter, “New York’s Grid Plan Must Protect Overburdened Communities,” is

available for publication. Media outlets may publish it in full with attribution to Raya Salter and EJLPC.

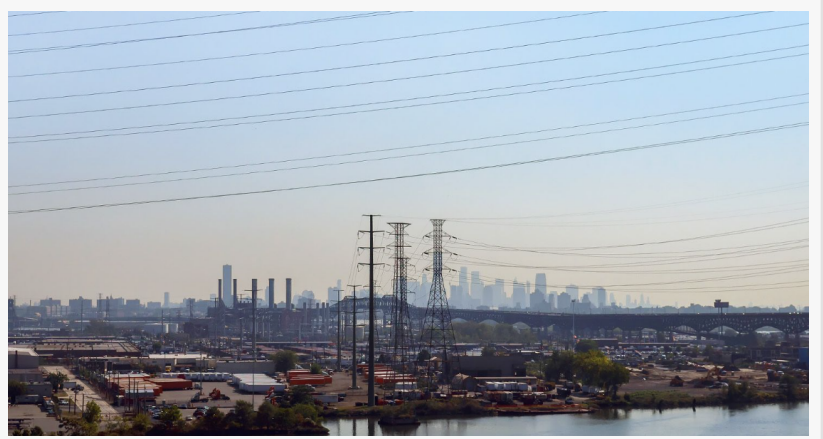
EJLPC's comments identify three major concerns with the current planning process: bulk transmission was considered relatively late compared with local projects; the analysis captured

only a narrow portion of transmission's potential benefits; and the plan assumes significant development of downstate resources that may not be commercially or practically available on the necessary timeline.

The filing specifically supports further evaluation of Zone E-J transmission, which could move lower-cost and cleaner electricity from upstate New York toward New York City and other downstate load centers. EJLPC notes

that federal analysis identified the corridor as the highest-value within-region transmission link in the country, while NYISO has projected growing transmission security deficiencies affecting New York City and the Lower Hudson Valley in the early 2030s.

Those reliability concerns are emerging as aging downstate power plants face retirement. New York Power Authority plans to deactivate seven small gas plants in New York City and Long Island, totaling more than 500 megawatts, by the end of 2030. Other generating units have already received extensions because of reliability needs, prolonging their operation in communities already burdened by pollution.



NYC Grid Infrastructure

EJLPC's comments also support evaluation of additional Zone C-E transmission to address west-to-east constraints and strengthen the backbone of New York's electric system.

The organization is asking the Commission to require a comprehensive benefit-cost analysis comparing competitively proposed bulk transmission projects with the local solutions identified through the existing planning process. That analysis should account not only for construction costs and reliability, but also for broader system savings, fossil-plant retirements, pollution reductions, public-health benefits, and benefits to disadvantaged communities.

"The question is not whether New York needs to invest in its grid. It does," Raya Salter, ED of EJLPC and Member of the NYS Climate Action Council, said. "The question is whether we are making the investments that give New Yorkers the greatest value and position us for the system we actually need decades from now. Transmission decisions made today will shape electricity bills, reliability, and which power plants remain online for years to come. We need to get them right."

New York's Climate Action Council has estimated that implementation of the state's climate law could produce \$50 billion to \$110 billion in public-health benefits from improved air quality through 2050, underscoring the importance of considering health impacts alongside traditional grid-planning metrics.

EJLPC concludes that a timely transmission process that properly evaluates the multiple benefits

of bulk transmission would give New York a better chance of achieving a reliable and affordable electric system without unnecessary dependence on aging, polluting fossil generation.

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About the Energy Justice Law and Policy Center

The Energy Justice Law and Policy Center works on energy policy, law, education, and programs focused on building a more affordable, equitable, healthy, and sustainable energy system. EJLPC is a member of New York's Energy Policy Planning Advisory Committee, which advises on long-term statewide energy planning.

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