

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

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Petition of New York Transco LLC and New York Power Authority for a Certificate of Environmental Compatibility and Public Need, Pursuant to Article VII of the New York Public Service Law, to Construct, Operate, and Maintain an Approximately 89.7-Mile Underground Transmission Line through Suffolk, Nassau, Queens, Bronx, and Westchester Counties.

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Case 24-T-0446

**GOLD COAST BUSINESS ASSOCIATION  
STATEMENT IN OPPOSITION TO JOINT PROPOSAL**

Dated: June 8, 2026

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The Gold Coast Business Association (GCBA) respectfully submits this Statement in Opposition to the Joint Proposal filed with the New York State Public Service Commission (the “Commission”) on April 30, 2026 (the “Joint Proposal”), by New York Transco LLC and New York Power Authority (together, the “Applicant”) for approval by the Commission.

**STATEMENT**

The Gold Coast Business Association (GCBA), representing businesses, property owners, employers, and community stakeholders throughout Glen Head, Sea Cliff, Glen Cove, and the surrounding North Shore communities respectfully submits this letter in strong opposition to the Joint Proposal. We recognize the need for reliable energy infrastructure; however, this community faces a highly concentrated set of localized risks, unlike any other area impacted by this project. Glen Head and Glenwood Landing sit at a critical geographic junction—where the three terrestrial underground cables transition to submarine lines under Hempstead Harbor. The ramifications of the Propel project in this area will be substantially more severe than any other area along the 90-mile project route. As such, we believe that the comments from this area should carry more weight.

We believe this project presents unacceptable risks to the local economy, the local environment, as well as public health and safety. As business owners, employers, and taxpayers,

we cannot support a project that threatens our livelihoods and places so much uncertainty and potential danger directly within our neighborhoods.

### **Economic Harm to Small Businesses**

The GCBA represents the very businesses that will bear the burden of prolonged construction and infrastructure installation with three cables, installed in three separate trenches, which are proposed to be dug through our business district and primary roadways. Local business requires ease of access for customers, suppliers, and employees. The communities of Glen Head and Glenwood Landing are located on a peninsula, which limits north/south transit north of Route 25A (Northern Blvd) to a few ‘main’ roads, several of which are one lane in each direction, with no, or a limited, shoulder. Under the Joint Proposal all these roads are permitted to have construction activity simultaneously. Traffic in this area is enough of a problem without construction, but having multiple main arteries with lane closures simultaneously would make it nearly impossible for small business to operate, no less facilitate normal movement for residents, and first responders.

All of this will, of course, be compounded by an influx of construction vehicles, employee vehicles and construction materials. Where will these vehicles and materials be stored? By necessity, many of the workers will come from off Long Island. Where will they park? All these present additional complications to an already challenging traffic situation created by the Joint Proposal. These disruptions, erroneously described as temporary, can easily become persistent for extended periods of time under these circumstances.

**CHPE Project.** The Commission must learn from the mistakes of the past. The terrestrial portion of the Champlain Hudson Power Express project (CHPE) caused serious issues for local business in Rockland County, including disrupted utilities, local flooding, massive traffic jams,

and lost business. Local businesses claimed \$13 million in lost profits<sup>1</sup> and some local businesses were forced to close permanently. We note that these problems were caused when digging a single trench. It does not take much imagination to consider what might happen when multiple trenches are dug. This project will require TWO trenches over a span of approximately 3.5 miles that traverses the primary business district of Glenn Head and Glenwood Landing as well as major ingress/egress arteries that supply access to these areas.

It is highly unreasonable to ask this local business community to bear that burden alone, as was done in the CHPE project. We note that the Joint Proposal includes protections for commercial fishing. Why is water-based business more deserving of protection than land-based business?

In light of the substantial economic issues in Rockland County, the exclusion of small business protections in the Joint Proposal is unconscionable and is neither fair nor appropriate. It is incumbent on the Commission to recognize this inequity, otherwise it will no longer be protecting the public, its primary mission. If we can afford to spend \$36 million per mile off the Propel cables, we can certainly afford to protect local businesses.

Small businesses are still recovering from years of economic challenges, particularly COVID, but also the continuing domination of Amazon in the retail sector. Many businesses simply cannot absorb another significant disruption imposed upon them without suffering lasting consequences. Long Island Business News notes:

“Most businesses on Long Island are small businesses. In fact, more than 80 percent in Nassau and Suffolk counties have fewer than 10 employees, notes Stacey Sikes, acting president and CEO of Long Island Association. “When small businesses face external pressures that impact their finances, it’s more difficult for them to absorb these price

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<sup>1</sup> Tina Traster; Rockland County Business Journal; CHPE Draws Line In The Sand: Says It’s Not Responsible for Hardship Caused To North Rockland Businesses During Construction; April 15, 2026.

increases just because their margins are so thin,” said Sikes, adding that Long Island also has among the country’s highest taxes in the country.”<sup>2</sup>

The Commission must account for the real-world effects on local businesses Glen Head and Glenwood Landing and all downtown business districts impacted by this project. We hold no grudge against the unions that support this project. They need to live too; however, we must object to trading the gain of temporary construction jobs in exchange for the loss of permanent small business jobs.

### **Threat to Long Term Business Vitality**

Glen Head and surrounding areas have been pursuing sewers for many years. Existing regulations for septic systems make it almost impossible to open a new full-service restaurant in this area without sewers. As a result, the number of restaurants, the life blood of local business that brings in customers from other areas, has been steadily declining. The GCBA firmly believes that for this community to thrive over the long term, the installation of sewers is a requirement, not a luxury. This is also true from an environmental perspective. There is already far too much run-off into Hempstead Harbor, a precious recreational resource, and that problem that can only be addressed with sewers.

The installation of this project would likely prevent the installation of sewers in this area forever and potentially create much more severe local environmental problems -- polluted drinking water and a polluted harbor. The inability to install sewers would be a permanent and insurmountable obstacle for the future development and prosperity in the area. That is not fair and equitable treatment.

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<sup>2</sup> Arlene Gross, Long Island Business News; How LI small businesses are navigating current economic headwinds; April 30, 2026.

## **Greenhouse Gas Emissions**

China GHG emissions grew by 2% in early 2026, which equates to an increase of 240 million tons.<sup>3</sup> The official gross greenhouse gas output for the state is 354.06 million metric tons of CO<sub>2</sub>e.<sup>4</sup> If New York could go to zero emissions tomorrow, it would not amount to a hill of beans for global greenhouse gas emissions. In fact, the Biden EPA, in 2021 stated that the Vineyard 1 wind project (and wind power in general) would have a negligible impact on global greenhouse gas emissions.<sup>5</sup> This project prioritizes a futile effort by NYS to solve a global greenhouse gas problem it has no power to solve and it does so in a way that eliminates any possibility to remedy local environmental damage, where the State has all the power to solve these local environmental problems.

## **Public Safety Concerns**

The Commission knows full well that this project was designed to deliver renewable power and that renewable power requires battery storage to deliver power reliably. As such, this project and battery storage are closely aligned and, in fact, should be considered as one project. We note the recent expansion of the substation to be adjacent to the site proposed by Jupiter for a 275MW battery storage facility. We can read the handwriting on the wall.

While battery storage fires may be statistically uncommon, that is of small consolation for areas that are impacted by the contamination from battery fires. In fact, we learned recently that the battery fire in East Hampton, NY in 2023 has indeed caused serious groundwater contamination, despite assurances from State Inter-Agency Fire Safety Working Group that there

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<sup>3</sup> Carbon Brief; Analysis: China's CO<sub>2</sub> climbs 2% in early 2026 due to 'wasted' wind and solar; 4/6/2026

<sup>4</sup> 2025 Statewide Greenhouse Gas Emissions Report

<sup>5</sup> Vineyard Wind 1 Offshore Wind Energy Project Final Environmental Impact Statement Volume II, March 2021, Pg. 76 Conclusion

was none. Lawsuits are pending<sup>6</sup> and we now know that we cannot trust the State to tell us the truth. Perfluorinated compounds (PFAS) have been found in drinking water and as the local East End Beacon reported: "...lithium ion battery fires are suppressed with high volumes of water, not foam, and the form of contamination, PFPrA, is an indicator of the breakdown of lithium ion batteries, not firefighting foam."<sup>7</sup> There is no longer the ability to hide from the potentially serious consequences of battery fires. Renewable transmission infrastructure, like Propel, invites those batteries into our neighborhoods. We should not consider this until there is a fundamentally safe, non-flammable, battery technology.

**Drinking Water.** When considering this proposal, it is critical to understand that Long Island relies entirely upon a Federally designated Sole Source Aquifer. Any release of hazardous materials, chemical runoff from construction-related contamination, cable failure, and/or fire suppression efforts has the potential to impact groundwater resources that Long Islanders depend upon every day. Once an aquifer is contaminated, remediation is costly, difficult, and in some cases impossible. The risk to our drinking water alone should warrant extreme caution. This project is a step backward in protecting our diminishing groundwater resources, not to mention our harbor.

**EMF emissions** are also an issue. The Joint Proposal includes potentially shallow burial depths along roadways, including Glen Head. The Project's EMF simulation study was produced assuming a minimum 5-foot burial depth. We would like to make several points:

1. Reporting from Newsday confirms that while the target depth is 5 feet, the trenches are planned to be 'at least 3 feet deep', creating an operational depth variance depending on

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<sup>6</sup> Mark Harrington, Newsday; Suffolk water authority sues battery plant developer over alleged water contamination; June 2, 2026.

<sup>7</sup> Beth Young; East End Beacon; Lawsuit Filed Over Contamination in East Hampton Public Wells After BESS Fire; June 2026.

the obstacles encountered below the street.<sup>8</sup> Case 13 of the Applicant’s Magnetic Field Simulation Report very clearly states that the minimum burial depth used for the simulation is 5 feet, not 3 feet.<sup>9</sup> If the actual burial depth can be as little as 3 feet, then the EMF simulation should assume a 3 foot depth, not 5 feet. There is no possible way to know what the burial depth will be at any point, so the worst case burial depth should be assumed for the simulation, not an average depth.

2. Case 13 of the Magnetic Field Simulation Report also shows that the NY exposure limit for EMFs (200 milligauss) is exceeded where three cables were planned to be collocated in Glen Head Rd and Glenwood Rd.<sup>10</sup> This catalyzed a change in preferred routes (i.e., the movement of the route from Glen Cove Rd to Glen Cove Ave and Kissam Lane) to avoid the co-location of three cables and therefore fall within the 200mg limit (albeit at a 5 ft. depth, not 3 feet). However, there is still one location where three cables will be collocated, which is at the intersection of Glen Head Rd. and Glen Cove Ave. The applicant has provided no simulation of this location under the revised routes. In addition, the Applicant has also not provided an EMF simulation study above the splice vaults, which are open pits.

3. Further, there are existing 69kv overhead cables that were not considered in the simulation. The state limit is not 200mg from a new source, it is 200mg from ALL sources.

This proposal is grossly incomplete without correcting these items.

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<sup>8</sup> Mark Harrington, Newsday; “Backers of \$3B cable designed to carry wind energy now downplay the wind part”; April 29, 2025.

<sup>9</sup> Propel NY Energy Project; Magnetic Field Simulation Report, Case 13, pages 64-65.

<sup>10</sup> Propel NY Energy Project; Magnetic Field Simulation Report, Case 13, page 39.

## **Propel is the Wrong Solution for a Self-Inflicted Problem**

As business organization, we fully understand the need for reliable power. However, this project was designed from the start to address the LIPPTN, which addresses the inability of the current transmission infrastructure to deliver offshore wind power to upstate NY. Empire II, the wind project slated to deliver power into the project, has been cancelled. As businesses we need to ask how it makes any sense to build an extraordinarily expensive transmission infrastructure when the source of the power remains uncertain. Without knowing the source of the power, pursuing this project now is putting the cart before the horse. Only government can be so illogical.

## **Listen to the Experts**

Potomac Economics serves as the Independent Market Monitoring Unit (MMU) for NYISO and their role is to provide an independent view that ensures that New York's wholesale electricity markets function efficiently, transparently, and competitively. In choosing this project, NYSIO chose to ignore the 2023 advice of Potomac<sup>11</sup> and chose this project, despite the following findings:

**“As MMU, we evaluate the market effects of individual projects considering that an inefficient project can harm the electricity markets by distorting energy and capacity prices in the short-term, crowding-out more cost-effective investment, and inflating market risks in the long-term. However, this assessment of projects’ economic efficiency must include factors that are not priced in the NYISO markets (such as the degree to which they facilitate renewable energy production). Inefficient**

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<sup>11</sup>David Patton, Ph.D.; Pallas LeeVanSchaick, PH.D. & Joseph Corsica; NYISO MMU Evaluation of the Long Island Offshore Wind Export PPTP Report; May 2023

projects (i.e., projects whose costs exceed the priced and unpriced benefits they produce) harm the NYISO markets and ultimately raise the cost of satisfying the Public Policy Requirement.”

In assessing the project, Potomac reaches three conclusions:

1. “Our assessment shows that the combined benefits for the T051 project (*this project*) are substantially less than the costs, yielding a Benefit-Cost Ratio of 0.81 over the 20-year period from 2030 to 2049.”...“Our calculation includes costs of O&M and financing during construction for the new transmission project. These are major cost elements for each of the new transmission projects and omitting them significantly understates the true costs of the projects.” (*Note: Potomac is an unbiased expert. This observation reflects an obvious bias in the selection process for Propel. The fact that Potomac called out NYISO for their obviously faulty calculations should be particularly noted.*)
2. “Second, most of the benefits in 2030 are contingent on the status of the Empire Wind II generator. If Empire Wind II does not proceed with construction... most of the benefits would be lost in the initial years of the study period. This highlights the substantial uncertainty associated with these early benefits.” (*Note: there is no longer any uncertainty, Empire II has been cancelled.*)
3. “Third, our estimated benefits rise significantly over time making both projects appear cost-effective by 2040 when the State would become much more reliant on Dispatchable Emission Free Resources (“DEFER”). This occurs because DEFERs are assumed to have a relatively high marginal cost (\$150 per MWh) compared to conventional resources... This benefit is extremely uncertain because some zero

**carbon technologies are likely to be developed that have much lower marginal costs, such as small modular nuclear reactors.”** (*Note: Why the rush to complete this project? Better technology is coming and the need for these cables is highly uncertain.*)

And Potomac continues:

“The Empire Wind II project accounts for a disproportionately large share of Long Island offshore wind curtailment – 93, 77, and 15 percent in 2030, 2035, and 2040, respectively. Given that most of the reductions in offshore wind curtailment is of the Empire Wind II project before 2040, the benefits of both projects (*Propel and the rejected project*) in the early half of the study period are highly dependent on whether the Empire Wind II facility is built and whether it maintains its currently planned interconnection point.”... **“For example, we estimate both projects to have a benefit-cost ratio close to 0.1 in 2030 if the Empire Wind II project is not built or relocates.”**

### **The Impact of AI Datacenters and New Technology**

While AI is massively expanding power needs, it is also massively accelerating power research and development. Rather than shoot ourselves in the foot with first generation technology, why does it not make sense to take a step back and allow technology to develop that is fundamentally safe and unlikely to require a massive transmission infrastructure. As Potomac stated in the 2023 report: **“Given the estimated investment lead time of around six years and small benefits before 2040, it is premature to move forward with a capital-intensive transmission project at this time.”** Since that was written, Empire II has been cancelled. We

must ask the obvious question. What is the rationale to ignore the advice of the independent analytical organization whose sole job it is to keep NYISO on the straight and narrow?

### **The Need for this Project is Not Clear**

It is undeniable that this project was designed and intended to provide “transmission capability to deliver at least 3,000 megawatts from offshore wind projects ...”<sup>12</sup>. But as the pressure on wind power grew and Empire II was cancelled, the narrative shifted to “benefits for greater grid reliability amid projections of increased energy usage.”<sup>13</sup>

Of course, much of the projected increase in usage was due to New York regulation designed to force the use of electric cars and electric appliances and HVAC. Datacenters will be huge users of power, but no one in their right mind would build a data center on Long Island, power is already too expensive!

The power generation shortfall, if there is one, is self-inflicted as the State chose to close over 4,315 MW of generation capacity over the last 5 years while adding only 2,274 MW. The state is 100% responsible for the decline in generation capacity. Closing that capacity before new capacity was available is proving to be a serious error and Nassau County, and particularly Glen Head, should not have to pay the price of that extraordinarily poor decision. Is there something in this project for Long Island? The answer appears to be no. Newsday states:

"But the region also needs more power-transmission infrastructure, Stephenson (senior vice president for power supply for LIPA) said. The LIPA power review will assume that the Propel cable project is in service by 2030, he added. “It’s projected to reduce our on-island capacity needs, because we can actually import from upstate a little bit more, and

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<sup>12</sup> Mark Harrington, Newsday; “Backers of \$3B cable designed to carry wind energy now downplay the wind part”; April 29, 2025.

<sup>13</sup> Ibid

so we're less reliant on on-island capacity, so it's helpful from that perspective." LIPA is projecting something over 100 megawatts of capacity to be addressed by the cable."<sup>14</sup>

A quick search using Google AI found the following: "Building a 100 MW combined cycle gas plant costs between \$120 million and \$215 million to construct." So, we are spending \$3.3 billion to dig up Long Island and disturb ecologically important waterways and disrupt 1.4 million County residents to install cables, when an investment somewhat north of \$200 million can achieve the same result with far less disruption. In addition, if we use newer technology, like Bloom Energy's fuel cell technology, we can eliminate the combustion of the gas feeding that new plant. No NOX emissions, no SOX emissions; much cleaner than a combined cycle natural gas plant.

Finally, there are obvious concerns regarding potential decreases in property values, increased insurance costs, insurability of homes and commercial properties located near project infrastructure, especially battery storage facilities, which are a requirement for renewable energy.

## Conclusion

The Joint Proposal fails on all levels.

- **It is harmful to businesses and residents.** The proposal does little or nothing to protect small business from physical and financial harm due to the project, despite clear evidence of the potential for real harm as demonstrated at CHPE in Rockland county.

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<sup>14</sup> Mark Harrington, Newsday; Tale of 2 LI energy projects: Gas pipeline advances, power line lacks key fed OK; May 31.2026.

- **There is no specific identified source of power for these cables.** With Empire II cancelled, this project is a solution in search of a problem. There is nothing except governmental obstinance preventing the State from taking a step back to re-assess power needs; determine where and what kind of new generation should be built and then plan whatever transmission capability is necessary. After a tumultuous five years where the entire energy market has been turned upside down. This is not the time to to shoe horn an old plan that does not fit the new market.
- **LIPA states that the cables will provide ‘something over 100 MW’ to Long Island.** New York can add 100 MW of baseload generation on-Island for less than 1/10 the cost of these transmission cables. To layer a \$3 billion cost on to New York rate payers to fund a project the MMU assesses as speculative, makes no sense. If you won’t listen to us, listen to the independent experts, not the experts tainted by politics, profits, or ideology.
- Perhaps most concerning is the growing belief among residents and business owners that community concerns are being minimized rather than addressed and the Joint Proposal reinforces that message loud and clear. The Joint Proposal is not in the public interest. It fails to fairly consider the unique impacts the project will have on the communities of Glenwood Landing and Glen Head in almost every way.

The Commission should reject the Joint Proposal. That would force NYISO to go back to the drawing board and make a new plan that is not dependent on renewables. In her 2026 State of the State address, The Governor stated, “My commitment to an all-of-the-above approach will

ensure we keep the lights on and prices down.” It is time to make the ‘all of the above’ policy a reality. Killing this project can start that process.

Dated: June 8, 2026,

Respectfully submitted,

/s/ Jeannie Riccardo

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