

OFFICE OF THE
DEMOCRATIC MINORITY



DELIA DERIGGI-WHITTON
MINORITY LEADER

NASSAU COUNTY LEGISLATURE

THEODORE ROOSEVELT EXECUTIVE & LEGISLATIVE BUILDING
1550 FRANKLIN AVENUE - ROOM 131
MINEOLA, NEW YORK 11501
TELEPHONE: (516) 571-6211
E-MAIL: dderiggjwhitton@nassaucountyny.gov

June 26, 2026

New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350
Re: Case 24-T-0446 – Propel NY Energy Project

Honorable Members of the Commission:

I write as Minority Leader of the Nassau County Legislature and as the elected representative for North Shore communities that would be directly impacted by the proposed Propel NY Energy project. I respectfully urge the Public Service Commission not to approve this project in its current form.

I want to be clear at the outset: I understand the importance of a reliable electric grid. No responsible public official can ignore the need to modernize aging infrastructure, strengthen resiliency, and plan for future demand. However, reliability cannot be used as a blank check to impose a massive transmission project on local communities without fully addressing environmental risks, emergency response questions, construction impacts, and the very real cost-of-living pressures already facing Nassau County residents.

As currently proposed, Propel NY would place high-voltage underground transmission infrastructure through densely populated communities and install submarine cable beneath sensitive waterways, including Hempstead Harbor and the Long Island Sound. These are not abstract lines on a map. They are neighborhoods, business corridors, school routes, emergency access roads, waterfront habitats, shellfish areas, and cherished public resources.

My strongest concern is water quality.

Hempstead Harbor and the surrounding marine environment are vital ecological, recreational, and economic assets. Any project that proposes to disturb the bay bottom must meet the highest possible standard of review. The installation of submarine power cables can require trenching, jet plowing, dredging, anchoring, vessel traffic, and other seabed disturbances. These activities can resuspend sediments, increase turbidity, disturb benthic habitat, and potentially mobilize

contaminants that have settled over time in the harbor floor.

The public should not be asked to accept broad assurances that these impacts will be temporary or manageable. Before any approval is granted, residents deserve site-specific answers.

The Commission should require an independent, publicly available water quality and sediment risk assessment that addresses, at minimum:

1. Baseline sediment sampling along the full underwater route, including testing for heavy metals, hydrocarbons, PFAS, PCBs, and other legacy contaminants;
2. Modeling of turbidity and suspended sediment plumes under real tidal, storm, and seasonal conditions;
3. Impacts to shellfish, finfish, benthic organisms, wetlands, and nearshore habitat;
4. A clear explanation of how construction will avoid or minimize impacts during sensitive spawning and migration periods;
5. Real-time water quality monitoring during construction, with enforceable stop-work thresholds;
6. Public reporting of monitoring data in a format residents can actually access and understand.

The Commission should also require a detailed plan for what happens if something goes wrong underground or under the bay.

A fault, breach, exposure, overheating event, or other failure involving buried or submarine cable is not the same as repairing a downed overhead wire. It may require specialized detection, marine vessels, excavation, sediment disturbance, road opening, dewatering, and emergency coordination across multiple agencies. If the cable fails beneath Hempstead Harbor or the Long Island Sound, residents deserve to know who responds, how quickly the issue can be located, what environmental protections are triggered, who pays for the repair, and how the public will be notified.

The current record does not provide sufficient confidence on these questions.

The Commission should require, before approval, a comprehensive Cable Failure and Environmental Response Plan that includes:

1. Fault detection and isolation procedures;
2. Emergency repair protocols for both roadway and underwater segments;
3. Water quality protections during repair work, not just initial installation;
4. Coordination requirements with Nassau County, local municipalities, fire departments, police departments, marine units, and emergency management officials;
5. Clear liability provisions for environmental damage, property damage, and municipal costs;
6. A dedicated financial security mechanism so taxpayers are not left holding the bag if repair or remediation becomes necessary.

The same standard should apply to electromagnetic fields and thermal impacts. I am not

suggesting that every concern raised about EMF is proven science. But it is also not enough to tell residents that electric and magnetic fields are simply part of everyday life. A 345-kV transmission project running through residential communities and marine habitat warrants site-specific modeling, disclosure, and post-construction verification.

For land-based portions, residents should receive clear projections of expected magnetic field levels at homes, schools, sidewalks, playgrounds, businesses, and other sensitive locations. For underwater portions, the Commission should require an assessment of potential impacts on marine species that rely on electromagnetic sensitivity, migration patterns, spawning grounds, and benthic habitat. Where scientific uncertainty remains, the burden should be on the applicant to monitor, mitigate, and publicly report—not on residents to simply trust that everything will be fine.

The cost-of-living question is equally important.

Nassau residents are already struggling with some of the highest property taxes, utility costs, housing costs, and general living expenses in the country. A multi-billion-dollar transmission project cannot be justified with vague promises of future system benefits while residents are left wondering whether their monthly bills will rise.

Before this project advances, the Commission should require a plain-language ratepayer impact analysis that answers the questions every family and small business owner would ask:

- Will this project lower utility bills?
- If so, when and by how much?
- Who pays for construction?
- Who pays for cost overruns?
- Will Long Island residents bear a disproportionate burden?
- What protections exist if projected benefits do not materialize?
- How does this project directly improve affordability for the communities hosting the infrastructure?

Reliability matters, but so does affordability. Public need must mean more than systemwide benefits on paper. It must mean a project that ordinary residents can understand, trust, and afford. The construction impacts also cannot be minimized. Local roads, small businesses, school transportation, emergency response routes, and daily life would be affected for years.

Communities in my district have already seen how major infrastructure work can disrupt traffic, harm local businesses, and place stress on residents. The applicant should be required to provide binding traffic mitigation plans, emergency access plans, business disruption mitigation, restoration commitments, and direct municipal coordination before any certificate is issued. At this stage, my position is straightforward: Propel NY has not met the burden necessary to proceed in its current form.

I respectfully request that the Public Service Commission:

1. Reject approval of the project as currently proposed, or require substantial modifications before any certificate is granted;
2. Require a supplemental, independent review of water quality, sediment disturbance, cable failure risks, EMF, thermal impacts, and underwater repair scenarios;
3. Require additional in-person public hearings in the directly impacted North Shore communities;
4. Require full disclosure of projected ratepayer impacts and cost-overrun protections;
5. Require binding local mitigation agreements before construction can begin;
6. Prohibit approval of any Environmental Management and Construction Plan until affected municipalities and residents have had a meaningful opportunity to review and respond to complete project-specific information.

The people I represent are not asking for slogans. They are asking for answers. They are asking whether their drinking water, harbor, bay, businesses, roads, homes, and utility bills are being protected. They are asking what happens if the project fails underground or underwater. They are asking why their community must carry the burden of a project whose local benefits remain unclear.

Until those questions are answered fully and publicly, I cannot support Propel NY in its current form.

Thank you for your attention to these serious concerns.

Respectfully,

A handwritten signature in cursive script that reads "Delia DeRiggi-Whitton".

Delia DeRiggi-Whitton
Minority Leader
Nassau County Legislature