



Repowering Fossil Generation in NY

The importance of strategic messaging to unlock generation efficiencies

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ABOUT GABEL ASSOCIATES, INC.

Gabel Associates, Inc. (<http://www.gabelassociates.com>) is an energy, environmental and public utility consulting firm with its principal office located in Highland Park, New Jersey and satellite offices in Philadelphia, Pennsylvania; Miami, Florida; Baton Rouge, Louisiana; Dallas, Texas; and Denver, Colorado.

For over 30 years, the firm has provided quality energy, environmental and public utility consulting services and strategic insight to hundreds of clients throughout the United States.

The firm has successfully assisted public and private sector clients with implementing energy plans and projects that reduce costs and enhance environmental quality, and our staff possess strong economic, financial, project development, technical, and regulatory knowledge and expertise.

Key Differentiators



gabel associates

Multidisciplinary energy consulting firm with unique capabilities and experience throughout the U.S.

- Specialized advice and analysis for over three decades
- Extensive and diverse client base across industry sectors
- Refined forecasting activities using proprietary tools and investment-grade models
- Participation in hundreds of transactions in retail and wholesale energy markets
- Extensive knowledge and on the ground presence in all RTOs across the country
- Pioneers of innovative and cutting-edge projects and development support for over 250 renewable projects
- Expert testimony on a wide range of issues at state utility commissions and FERC
- Regulatory knowledge and strong relationships with key stakeholders and policy makers to craft effective engagement strategies to advance client interests
- Broad expertise that allows for a comprehensive and valued perspective on key energy issues

Repowering Lowers Emissions and Supports Affordability

Affordability achieved through resource diversity

- Reliance on older, inefficient gas peakers to cover solar outages contributed to high LBMPs upstate during recent cold weather event. Long Island fuel diversity allowed for lower prices during same event.
- NYISO reliance on older, higher emitting and higher costs thermal units expected to continue for foreseeable future.
- Higher forced outage rates for older resources increase reserve requirements driving a need for incremental generation to meet region's reliability needs.

Experience from PJM demonstrates how repowering with newer, more efficient technologies can substantially reduce emissions, complimenting state renewable energy deployment goals

- PJM emissions rates fell dramatically as new gas generation and growing renewable deployment reduced reliance on less efficient generation types.
- Repowering can drive drive emissions reductions and enhance affordability.
- States are utilizing fossil repowering to efficiently support emissions targets by 2030:
 - AZ utilities converting ~1.6 GW of coal to gas to reduce unit's CO2 emissions by 40-45%.
 - CO replacing 2.3 GW of coal with combination of gas, solar, wind, and storage to achieve 80% reduction in carbon emissions by 2030.
- PJM Reliability Resource Initiative (RRI) procured ~2.1 GW of repowered UCAP online by 2031.

Developers need clear line of site to manage permitting risk

- NYISO has been explicit in communicating reliability need for repowering and the associated efficiency gains and environmental benefits.
- CLCPA does not explicitly prohibit gas, though DEC rulings have muddied the waters.
- Risk hedged by providing developers with clear path to build.

MAIN TAKEAWAYS

- Repowering supports NY clean energy policy goals affordably.
- AZ, CO, and PJM examples illustrate multiple pathways to repower with commercial operation in 5 years.
- DEC guidance or rulemaking could enable repowering by minimizing permitting uncertainty.

Average NYISO Day-Ahead Prices Jan. 21-30, 2026

