



WHERE THE CITY MEETS THE COUNTRY

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Good afternoon,

I am here today representing North Shore Towers, a unique residential community with a longstanding commitment to both self-sufficiency and environmental responsibility.

North Shore Towers stands apart from typical buildings in New York City as we are not connected to the Con Edison grid, generating our own power. This independence, while environmentally beneficial, creates distinct challenges under Local Law 97. We've engaged Con Edison to explore a grid connection, but just reaching our property line will take 2-3 years. Extending that connection to our buildings would mean trenching across our extensive green space and constructing a costly vault substation. This effort alone would cost many millions of dollars, adding an unsustainable financial burden to our residents, many of whom are elderly and live on fixed incomes.

By self-generating power, North Shore Towers helps ease the strain on the city's grid, freeing Con Edison to build infrastructure to support larger communities such as North Shore Towers in the future. However, the proposed LL97 changes, particularly regarding cogeneration systems are an improvement but need more clarification. Moreover, the incentive programs designed to support compliance are largely limited to Con Edison customers, excluding communities like ours that lack grid access.

**We respectfully propose the following considerations:**

- Local Law 97 offers flexibility for income-restricted and rent-stabilized buildings, but it does not consider the financial challenges faced by many fixed-income residents. A significant portion of our community is elderly and living on fixed incomes, yet this financial reality is not currently reflected in the law.
  - We ask that the Department consider additional accommodation for buildings housing residents on fixed incomes who would face undue financial hardship from the substantial costs of compliance.
- We ask for a clear understanding of the long-term applicability of the proposed efficiency standards. Specifically, does the 55% average efficiency and NOx limit of 4.4 lb/MWh apply only from 2025 to 2029, or will these standards continue indefinitely? This clarity is crucial for planning purposes, given the potential financial and operational impacts of maintaining these targets.

- Con Edison's efficiency rates for electricity production should be publicly available. Having this data ensures fair and transparent comparisons with self-generating facilities, enabling the Department and stakeholders to assess the impact of different energy sources accurately.
- We urge the Department to adopt flexible compliance pathways that account for North Shore Towers' self-sufficient energy model. This flexibility could include performance-based standards, credits for existing efficiency measures, or alternative compliance mechanisms that recognize the role of self-generated power in reducing citywide grid demand.
- The city's incentive programs must be inclusive. Currently it is limited and excludes buildings that are not Con Edison customers, limiting our ability to offset the high costs of compliance. Expanding eligibility criteria to include non-grid buildings would support a fairer approach for facilities like ours that share the city's sustainability goals but face unique challenges.

With some adjustments, we can continue to contribute positively to the city's environmental objectives while safeguarding our residents' financial stability, especially those who are most vulnerable.

Thank you for your consideration.

North Shore Towers Apartments Incorporated.