



450 Mamaroneck Ave., 3rd fl, Harrison, NY 10528
(914) 345-8737 • www.lhec.org • lhec@lhec.org

March 27th, 2026

Hon. Rory M. Christian, Chair
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, New York 12223-1350

Re: Petition of the Lower Hudson Education Coalition for an Informational Proceeding to Examine Electric Utility Readiness to Support School Bus Fleet Electrification Pursuant to Education Law § 3638

INTRODUCTION

The Lower Hudson Education Coalition (“LHEC”) respectfully petitions the New York State Public Service Commission (“Commission”) to initiate an informational proceeding, pursuant to Public Service Law §§ 4 and 5, to examine whether the State’s electric utilities are prepared to deliver the distribution infrastructure necessary to support the electrification of school bus fleets as required by Education Law § 3638.

LHEC is a coalition of school districts in the Lower Hudson Valley region of New York State. Our member districts collectively serve tens of thousands of students and operate hundreds of school buses across Westchester, Rockland, Putnam, Dutchess, and Orange counties. LHEC member districts are committed to the State’s environmental goals and support the long-term transition to zero-emission school transportation. This petition does not start from the position that the mandate should be delayed or repealed. Rather, it asks the Commission to exercise its regulatory authority to establish a factual record—through a transparent proceeding—of whether the electric utility infrastructure upon which the mandate depends can be delivered on the timelines the law contemplates. If that record demonstrates that the infrastructure is on track, districts will have the clarity and confidence they need to move forward. If it is revealed that it is not, the State will have the information necessary to make realistic adjustments before districts and taxpayers bear the consequences of a timeline set without a full understanding of what the grid can support.

BACKGROUND

A. The Statutory Mandate

As part of the SFY 2022–23 enacted budget, the Legislature added Education Law §3638, which requires that all new school bus purchases or leases be zero-emission vehicles beginning July 1, 2027, and that all school buses in operation be zero-emission by July 1, 2035. The statute applies to both district-owned fleets and private transportation contractors. New York was the first state in the nation to adopt a statewide electric school bus mandate of this scope.

The 2022 Environmental Bond Act, approved by voters in November 2022, includes \$500 million to support the transition to zero-emission school buses. NYSERDA administers the New York School Bus Incentive Program

(“NYSBIP”), which provides point-of-sale vouchers for bus purchases and charging infrastructure. NYSERDA also funds Fleet Electrification Plans (“FEPs”) to help districts plan their transitions. The State Education Department (“SED”) has developed a waiver process that permits districts to apply for up to four years of extensions from the 2027 new-purchase deadline, subject to forfeiture of Transportation Aid for noncompliant purchases absent a waiver.

B. The Infrastructure Challenge

While substantial attention has been given to vehicle costs and incentive availability, the critical bottleneck for school bus fleet electrification is increasingly the electric distribution infrastructure required to charge these vehicles. According to the Joint Utilities of New York, presented at the Westchester School Bus Electrification Forum on October 17, 2025, a full school bus depot requires electrical service comparable to an office tower or shopping mall—including dedicated transformers and, at larger scales, multiple dedicated transformers and high-tension service. While the Joint Utilities note that approximately 75% of evaluated bus sites could support a pilot of 10 or more buses without grid upgrades, full fleet conversion at most sites will require significant utility-side and customer-side infrastructure investment.

This is not solely a school district concern. An overtaxed electric grid affects entire communities. When a school bus depot draws the electrical load of a commercial building from a distribution system that was not built to handle it, the consequences extend to the homes, businesses, hospitals, and emergency services that share the same infrastructure. Residents across the Lower Hudson Valley are already contending with rising utility rates and aging distribution systems. Layering a massive, mandated new demand onto a grid simultaneously absorbing building electrification requirements, electric vehicle adoption, and data center growth—without a coordinated plan—risks service degradation and cost increases borne by every ratepayer in the region.

C. Evidence from LHEC Member District Fleet Electrification Plans

LHEC member districts that have completed NYSERDA-funded or independently commissioned Fleet Electrification Plans (FEP) are encountering a consistent pattern of infrastructure-related obstacles. To protect the confidentiality of individual districts, the following evidence is presented in anonymized form. The underlying data is drawn from professional engineering studies conducted by qualified firms and funded, in certain cases, by NYSERDA itself.

As a representative sample of our region, the following six member districts have completed detailed FEPs. Three are served by Consolidated Edison in Westchester County; two are served by NYSEG in Putnam and Westchester counties; and one is served by National Grid in Dutchess County. Together, these six districts operate approximately 354 school buses across three utility territories and face an aggregate capital cost of more than \$133 million to fully electrify their fleets. The table below summarizes the infrastructure requirements identified in each plan:

	District A (52)	District B (78)	District C (86)	District D (7)	District E (96)	District F (35)	Aggregate
Fleet Size	52	78	86 (71 electrifiable)	7	96	35 (23 electrifiable)	~354
Total CapEx (No Incentives)	\$22.0M	\$34.9M	\$25.5M	\$4.4M	\$46.2M	Not estimated in study	>\$133.0M
New Utility Service Required	500 kVA dedicated service	2,000 kVA transformer + feeder upgrades	2,500 kVA transformer + 160 ft. 3-phase pull	New 480V service at 2 campuses (520 kW + 240 kW)	New transformer phased 1,500–2,500 kW; no sub/feeder upgrades	New dedicated input: 1,200A @ 480V 3-phase (~1,000 kW)	All six require new dedicated service
Peak Demand (Unmanaged)	1,217 kW	1,800 kW	Not specified	520 kW	2,320 kW	656 kW	—
Peak Demand (Managed)	283 kW (77% reduction)	682 kW (62% reduction)	Not specified	360 kW (31% reduction)	375 kW (84% reduction)	290 kW (56% reduction)	—
District-Side Electrical	New switchgear, transformer, service	3000A 480V service, sub panels, trenched conduit	4000A switchboard, conduit, subpanels	New 800A/480V switchgear, conduit, sub-panels	Two 2000A 480V switchgear with MDPs, trenched conduit, cement medians	New dedicated electrical entrance; may require multiple transformers/distribution stations	All require major behind-the-meter buildout
Reported Utility Timeline	12–18 months; switchgear may add 1 yr	12–18 months	12+ months for equipment	~12 months for new service	18–36 months for new pad mount transformer	Not specified; utility coordination required	12–36 months
Implementation Phases	2 phases (2025, 2030)	5 phases (2027–2035)	4 phases (2025–2035)	4 phases (2028–2031)	3 phases, 6 sub-phases (2029–2034)	Gradual, 5–10 years	—

Several findings are particularly significant:

- Utility Lead Times.** All six districts report that securing new dedicated electrical service requires 12 to 36 months from application to energization. Equipment procurement timelines—particularly for switchgear and transformers—can extend this further. One district’s FEP explicitly notes that unless the utility has switchgear in stock, procurement alone could push the project timeline by a full year. Another district’s study estimates 18 to 36 months for utility-side installation of a new pad mounted transformer. These timelines mean that districts that have not yet initiated utility coordination may not be able to have charging infrastructure operational by the 2027 deadline, even with waivers.
- Scale of New Service.** None of the six districts can electrify their fleets using existing electrical service. Each requires entirely new, dedicated utility service connections with capacities ranging from 520 kW to 2,500 kW. Two districts require utility feeder upgrades or new service installations in addition to new transformers. These are not incremental upgrades—they are new utility installations comparable in scale to serving a commercial or institutional building.
- Cost Magnitude.** The combined capital cost across just five districts with full cost estimates exceeds \$133 million before incentives; a sixth district’s study did not include total capital cost projections. Behind-the-meter infrastructure costs alone—switchgear, panelboards, conduit, wiring—range from approximately \$700,000 to \$3.3 million per district. These figures do not include utility-side costs, which are to be determined by the serving utility. Across the Lower Hudson Valley, these infrastructure costs will aggregate to hundreds of millions of dollars.

- **Charge Management Dependency.** All six FEPs demonstrate that charge management systems are essential to making fleet electrification viable. Without managed charging, peak demand at these depots ranges from 520 kW to 2,320 kW. This reduction is critical—it determines whether a district needs a 500 kVA service or a 1,000+ kVA service, with corresponding implications for utility-side infrastructure and cost. However, charge management adds operational complexity and ongoing software costs that districts must absorb.
- **Physical Space Constraints.** One district with 86 vehicles can only electrify 71 due to physical space limitations at its existing bus depot. The stacked parking configuration cannot accommodate charger islands for all vehicles. This district’s study notes that future wireless charging technology may help but is not yet commercially available at scale. Space constraints are a practical barrier that no amount of funding can overcome at many existing depot sites.
- **Route Feasibility Limitations.** Two districts report that a portion of their routes cannot be served by current electric school bus technology, particularly in cold weather conditions. One district with 96 vehicles found that 7% of its active routes exceed the range of available electric bus models under worst-case winter and terrain conditions; another with 35 vehicles found that 34% of routes are infeasible at the coldest temperatures. Both studies project that advancing battery technology will resolve these limitations by 2035, but the gap underscores that fleet electrification is not solely an infrastructure problem—it also depends on vehicle technology that has not yet reached the market.
- **Coordination Gaps.** There is currently no formal regulatory mechanism requiring electric utilities to prioritize, plan for, or report on their readiness to serve school bus fleet electrification loads. District-utility coordination occurs on an ad hoc, district-by-district basis. While the Joint Utilities have provided advisory services and fleet assessments, there is no centralized planning process, no enforceable timeline for utility-side upgrades, and no transparency into how utilities are incorporating school bus electrification loads into their distribution system planning.

D. Statewide Grid Conditions Compound the Local Infrastructure Challenge

The infrastructure obstacles documented in LHEC member district Fleet Electrification Plans are not isolated local conditions. They reflect systemic pressures on the State’s electric grid that are independently documented by the New York Independent System Operator (“NYISO”) in its Power Trends 2025 report, the NYISO’s flagship annual assessment of grid reliability and market conditions.¹ The NYISO’s findings are particularly relevant to this petition because the grid constraints it identifies are most acute in the downstate region where LHEC member districts are located, and because the NYISO’s analysis confirms that school bus fleet electrification will compete for grid capacity with other large, mandated, and market-driven sources of load growth that are already straining the system.

Competing Demand from Large-Load Projects

The NYISO reports that the number of large energy-intensive load projects seeking to interconnect to the bulk power system has grown dramatically in recent years. In 2022, six large-load projects in the NYISO interconnection queue accounted for 1,045 MW of demand. As of April 2025, there are 20 large-load projects in the queue representing nearly 4,400 MW, with approximately 2,567 MW expected to be on the system by 2035.² These

¹NYISO, *Power Trends 2025: The New York ISO Annual Grid and Markets Report* (June 2025) (“NYISO Power Trends 2025”).

²NYISO Power Trends 2025 at 7 (Figure 1); *id.* at 6.

projects—primarily data centers, semiconductor fabrication facilities, and other high-tech manufacturing—are competing for the same utility planning bandwidth, transformer inventory, and distribution infrastructure that school districts require. School bus fleet electrification loads, while individually smaller than a data center, are mandated by statute and cannot be deferred at will. The Commission should examine how the utilities serving the Lower Hudson Valley are prioritizing these competing demands on their distribution systems.

Declining Reliability Margins and an Aging Generation Fleet

Since the passage of the Climate Leadership and Community Protection Act in 2019, 4,315 MW of generation have left the New York system while only 2,274 MW have been added—a net loss of more than 2,000 MW, enough capacity to power roughly two million homes.³ The statewide margin between available and required resources has narrowed to roughly half of its 2018 level.⁴ These pressures are especially pronounced in the downstate region served by LHEC member districts’ utilities. NYISO data show that the downstate zones (Zones F through K)—encompassing the Lower Hudson Valley, New York City, and Long Island—have only 5% zero-emission installed capacity, compared with 70% in the upstate zones.⁵ Downstate is overwhelmingly dependent on aging dual-fuel and gas-fired generation that the NYISO has flagged as increasingly subject to unplanned outages and deactivation risk. School bus depot loads in Westchester, Rockland, Putnam, Dutchess, and Orange counties will draw from this constrained downstate supply base.

Near-Term Reliability Violations in the Downstate Region

The severity of downstate grid constraints is underscored by the fact that the NYISO has identified actual reliability violations in New York City in both short-term and long-term planning reports. In 2023, the NYISO found a reliability deficiency of up to 446 MW in New York City beginning in summer 2025, driven by the deactivation of peaker plants under the DEC’s emissions regulations and forecasted demand increases. No market-based solution could be installed in time, requiring the NYISO to retain the Gowanus and Narrows generating units as necessary for reliability.⁶ The NYISO’s near-term reliability outlook for the downstate region hinges on the timely completion of the Champlain Hudson Power Express (“CHPE”) transmission project, expected to enter service in spring 2026. The NYISO has explicitly warned that delays in the CHPE project could result in deficient reliability margins within New York City beginning in summer 2026.⁷ The Lower Hudson Valley shares distribution infrastructure and transmission pathways with these same constrained downstate load zones. If the bulk power system serving the downstate region is already operating at or near its reliability limits, the addition of hundreds of school bus charging depot loads across the region warrants the careful, coordinated planning that this petition seeks.

The Winter Peaking Transition and Overnight Charging Loads

The NYISO projects that New York will transition from a summer-peaking to a winter-peaking electric system by the 2040s, driven primarily by electrification of space heating and transportation. Statewide winter peak demand is expected to grow by approximately 14,000 MW by 2040.⁸ This transition has direct implications for school bus fleet electrification. School bus charging is an overnight and early-morning activity—precisely the hours during

³NYISO Power Trends 2025 at 13.

⁴NYISO Power Trends 2025 at 13; *id.* at 41 (Figure 18).

⁵NYISO Power Trends 2025 at 44 (Figure 22).

⁶NYISO Power Trends 2025 at 10, 19–20.

⁷NYISO Power Trends 2025 at 22.

⁸NYISO Power Trends 2025 at 10–11.

which winter heating demand peaks. The NYISO has modeled approximately 6,400 MW of gas-only generation as unavailable during winter peak conditions due to natural gas supply constraints and has warned that statewide winter deficiencies could arise as soon as the 2029–2030 winter under normal weather conditions.⁹

This risk is particularly acute in the downstate region. Most downstate generation relies on natural gas, and dual-fuel generation—which can switch to oil when gas is constrained—accounts for 74% of downstate capacity.¹⁰ During the January 2025 polar vortex, natural gas prices in New York increased nine-fold.¹¹ As managed charging strategies shift school bus depot demand into overnight hours to reduce peak loads and infrastructure costs, the interaction between concentrated overnight charging and growing winter peak demand must be evaluated. The Commission should examine whether the utilities serving the Lower Hudson Valley have accounted for this convergence in their distribution system planning.

Insufficient New Supply to Match Mandated Demand Growth

The NYISO’s System and Resource Outlook forecasts that statewide electricity demand will increase by 50% to 90% over its 20-year study horizon, and that between 100 and 130 gigawatts of installed capacity will be needed to reliably meet that demand while complying with state energy policy mandates. At least 20 GW of Dispatchable Emission-Free Resource (“DEFER”) capacity will be needed by 2040 to replace the current 25.3 GW of conventional fossil-based generation. The NYISO notes that no DEFER technology is currently available at a commercial scale, and that research, development, and construction lead times may extend beyond the state’s policy timelines.¹² These findings are significant context for the school bus electrification mandate. The Legislature enacted Education Law § 3638 on the assumption that adequate electric infrastructure would be available to support the transition. The NYISO’s independent analysis demonstrates that the supply side of the electric system is not keeping pace with the aggregate demand growth driven by building electrification, transportation electrification, and economic development—all of which are occurring simultaneously in the Lower Hudson Valley.

The NYISO’s Own Call for Coordinated Planning

The NYISO’s CEO has stated that “[w]hat we do know with certainty is that as public policies drive more fossil generators into retirement to meet decarbonization goals and tighter emissions restrictions, new carbon-free resources are not being added to the grid fast enough to keep pace with expected demand growth,” and that “[a] careful and collaborative approach by all stakeholders is required for success across the broad range of economic and environmental policies.”¹³ LHEC agrees. The informational proceeding this petition requests is precisely the type of careful, collaborative, fact-based process that the NYISO’s own analysis demonstrates is necessary. The Commission is the appropriate body to convene that process with respect to the regulated distribution utilities upon which school bus fleet electrification depends.

⁹NYISO Power Trends 2025 at 11.

¹⁰NYISO Power Trends 2025 at 14.

¹¹NYISO Power Trends 2025 at 12.

¹²NYISO Power Trends 2025 at 23, 25.

¹³NYISO Power Trends 2025 at 1–2 (Letter from the CEO).

E. Existing Commission Proceedings Do Not Provide the Targeted Analysis That School Bus Fleet Electrification Requires

The Commission has already opened important electrification-related proceedings, including Case 18-E-0138 concerning electric vehicle supply equipment and make-ready infrastructure, Case 23-E-0070 concerning barriers to medium- and heavy-duty charging infrastructure, and Case 24-E-0364 concerning proactive planning for upgraded electric grid infrastructure. LHEC does not seek to duplicate those proceedings or to displace the broader planning work already underway. Instead, this petition seeks a narrower, time-sensitive record aligned to the specific mandates of Education Law §3638.

None of the existing proceedings is designed to produce utility-by-utility findings focused on school bus depot electrification in the Lower Hudson Valley, including whether depot sites can be energized on timelines compatible with the 2027 and 2035 statutory deadlines, which sites are likely to require feeder, transformer, or substation upgrades, what interconnection and construction lead times districts should realistically expect, and what reporting, tariff, or make-ready adjustments may be needed for school transportation use cases. A dedicated proceeding would therefore complement—not supplant—the Commission’s existing electrification dockets.

The most directly relevant of these dockets—Case 23-E-0070—illustrates the gap. The May 31, 2024 Electric School Bus Technical Conference convened under that case, featuring presentations by DPS Staff, NYSERDA, NYSED, and the Joint Utilities, demonstrated that the State’s agencies and utilities have engaged constructively with the school bus electrification challenge. However, that proceeding is broad in scope, encompassing all medium- and heavy-duty vehicle classes, and remains in its early stages. As of the Technical Conference, DPS and NYSERDA were still onboarding contractors to conduct a ZEV market analysis and barrier study, with the stated goal of informing “further MHD policies and proceedings, including those to be related to the electric school bus transition.” In other words, the MHD proceeding is a precursor study that may eventually lead to school-bus-specific regulatory action—it is not itself that action.

Furthermore, the Joint Utilities’ one-time capacity assessment conducted pursuant to a November 2023 Commission order in Case 18-E-0138—while valuable as a preliminary data point—was explicitly presented with significant limitations. It represented a snapshot as of May 14, 2024; it did not account for changes in school transportation needs or other planned loads; and the Joint Utilities emphasized that it “does not enable a school district to start a project immediately.” The assessment’s headline finding that approximately 85% of sites have sufficient capacity to support a “pilot project” obscures the fundamental challenge: it used an estimated charging demand of 20 kW per bus, whereas LHEC member district FEPs document unmanaged peak demands of 520 kW to 2,320 kW per site—loads requiring entirely new dedicated service connections, transformer installations, and feeder upgrades. A one-time capacity snapshot confirming that pilot projects are feasible is not a plan for full fleet conversion, nor does it obligate any utility to deliver the upgrades necessary for that conversion on any particular timeline.

The \$67 million reported as available statewide through MHD Pilot Incentive programs is shared across all medium- and heavy-duty vehicle categories—transit, freight, port operations, and school buses—and is not reserved for school bus electrification. Six LHEC member districts alone face aggregate infrastructure costs exceeding \$133 million. The statewide infrastructure cost for all 700-plus school districts operating approximately 45,000 buses will be orders of magnitude larger.

Finally, and most critically, school bus electrification is fundamentally different from other MHD electrification in ways that require separate regulatory attention. School buses are the only MHD vehicle category subject to binding statutory deadlines; the entities required to comply are public institutions funded by local property taxes and state aid that cannot absorb cost overruns or defer compliance at will; school bus charging infrastructure serves a public

safety function, as children depend on reliable bus service to attend school; and school district capital planning operates on voter-approved budget cycles that require multi-year lead times for infrastructure investments. These unique characteristics are not adequately addressed by the existing broad-based MHD proceedings. School districts facing a July 2027 new-purchase deadline cannot wait for a broad market study to conclude before the Commission examines whether the grid serving their depots can support the vehicles they are being required to purchase.

REQUEST FOR RELIEF

LHEC respectfully requests that the Commission initiate an informational proceeding to examine the following questions:

- 1. Utility Readiness Assessment.** What is the current state of readiness of each electric utility serving the Lower Hudson Valley (Consolidated Edison, Orange & Rockland Utilities, Central Hudson Gas & Electric, NYSEG, and National Grid) to deliver the distribution infrastructure necessary to support school bus fleet electrification at all school bus depot sites within their respective service territories by the 2027 and 2035 statutory deadlines? What proportion of school bus sites within each utility's territory can be served without grid upgrades, and what upgrades are required at the remaining sites?
- 2. Timeline and Capacity Planning.** What are the projected timelines for each utility to complete the infrastructure upgrades necessary to energize school bus charging depots? How are utilities incorporating school bus electrification loads into their distribution system planning processes, including capital planning, load forecasting, and system reliability analyses?
- 3. Rate and Cost Impacts.** What are the anticipated rate impacts on school districts and local taxpayers—and on the broader ratepayer base—associated with the electrical service upgrades required for fleet electrification? Are existing utility rate structures (including demand charges) appropriately designed for school bus fleet charging use cases, where loads are concentrated overnight and are highly seasonal? What rate design modifications or dedicated tariffs should be considered?
- 4. Make-Ready Program Adequacy.** Are existing utility make-ready and medium/heavy-duty vehicle infrastructure incentive programs sufficient to meet the scale of demand anticipated from school bus fleet electrification? The Joint Utilities have identified \$67 million available statewide for infrastructure pilot incentives—is this adequate given that six LHEC member districts alone face more than \$133 million in capital costs?
- 5. Grid Reliability and Community Impact.** What are the implications of concentrating large new electrical loads at school bus depots for the reliability and adequacy of service to surrounding residential and commercial customers? How will utilities ensure that the infrastructure buildout required for school bus electrification does not degrade service quality or materially increase costs for other ratepayers sharing the same distribution feeders?
- 6. Reporting and Accountability.** Should the Commission require electric utilities to file periodic reports on the status of school bus fleet electrification infrastructure requests, including the number of service applications received, average time from application to energization, the number of sites requiring distribution system upgrades, and the status and projected completion dates of those upgrades?

REQUESTED INITIAL ORDER

LHEC respectfully requests that the Commission issue an initial order that does the following:

- 1. Institute a Dedicated Proceeding.** Institute a proceeding focused on electric utility readiness to support school bus fleet electrification under Education Law § 3638, and designate Consolidated Edison, Orange & Rockland Utilities, Central Hudson Gas & Electric, NYSEG, and National Grid as initial responding utilities for the Lower Hudson region.
- 2. Require Utility Readiness Filings.** Direct each responding utility, within 60 days, to file a utility-specific school-bus-readiness assessment for the Lower Hudson region identifying known or reasonably projected depot loads, the extent to which existing service can accommodate those loads, the distribution upgrades likely to be required, principal engineering or procurement constraints, and realistic energization timelines.
- 3. Convene a Technical Conference.** Direct Department of Public Service Staff to convene a technical conference after the utility filings with participation from school districts, utilities, NYSERDA, the State Education Department, transportation contractors as appropriate, and other interested stakeholders.
- 4. Establish a Public Comment Schedule.** Establish a public comment and reply-comment schedule so that districts, utilities, ratepayer advocates, and other stakeholders may test the utilities' filings and identify practical implementation barriers.
- 5. Require Periodic Reporting Metrics.** Require the responding utilities to propose periodic reporting metrics, including at a minimum: the number of school-bus-related service requests received; average time from application to design; average time from design to energization; the number of sites requiring feeder, transformer, or substation upgrades; projected in-service dates; and estimated customer-side and utility-side cost ranges where available.
- 6. Reserve Authority for Further Relief.** Reserve authority to consider any further relief that may be warranted based on the record, including planning directives, make-ready program modifications, tariff or rate-design changes, reporting requirements, or other accountability mechanisms needed to align utility readiness with the statutory transition timeline.

COMMISSION JURISDICTION

The Commission has clear jurisdiction over the subject matter of this petition. Public Service Law § 5(1) vests the Commission with authority over the manufacture, conveying, transportation, sale, and distribution of electricity. The Commission's core functions include ensuring safe and adequate service (PSL § 65), overseeing utility rate design, and approving utility capital plans. The questions raised in this petition—whether utilities can deliver adequate distribution service to support a legislatively mandated load growth, on what timeline, and at what cost to ratepayers—are squarely within the Commission's regulatory purview.

LHEC emphasizes that this petition does not start from a predetermined conclusion about whether the statutory deadlines should be modified. That is a question for the Legislature, informed by facts. What this petition seeks is the establishment of those facts through a transparent regulatory process. The Commission is uniquely positioned to compel the production of data from regulated utilities, to evaluate that data with technical rigor, and to issue findings that can inform both utility planning and legislative decision-making.

CONCLUSION

The transition to zero-emission school buses is a generational investment in the health and safety of New York's students and in the State's climate future. LHEC supports this goal. But the success of this transition depends on infrastructure that school districts cannot build themselves—it depends on the electric grid. The Commission has both the authority and the responsibility to ensure that the State's regulated utilities are prepared to meet this challenge.

The evidence from LHEC member districts is clear: six districts alone, operating approximately 354 buses across three utility territories, face more than \$133 million in capital costs and each requires entirely new utility service connections with timelines of 12 to 36 months or longer. Without a formal, on-the-record assessment of utility readiness, school districts across the region are left to navigate infrastructure constraints district by district, with no transparency, no enforceable timelines, and no coordinated plan.

An informational proceeding would bring clarity, accountability, and coordination to a process that urgently requires all three. LHEC respectfully requests that the Commission grant this petition and initiate a proceeding at the earliest opportunity.

Respectfully submitted,

LOWER HUDSON EDUCATION COALITION

Steering Committee:

Kelly Lappan, Chair (*DCSBA – Executive Director*)

Jane Anderson (*Rye City – Board of Education*)

Marc Baiocco (*Clarkstown – Superintendent*)

Raymond Blanch (*Katonah-Lewisboro – Supt.*)

Sarah Carrier (*Croton-Harmon – Board of Education*)

Thomas DePrisco (*Pearl River – Board of Education*)

Caroline Hernandez Pidala (*Millbrook – Superintendent*)

Hrishi Karthikeyan (*Ardsley – Board of Education*)

David Leach (*Warwick Valley – Superintendent*)

Karyn Meier (*OCSBA Executive Director*)

Joseph Ricca (*White Plains – Superintendent*)

Karen Belanger, Admin. (*WPSBA - Executive Director*)