**Public Hearing Statement**

**Brian Gemmell**

**Chief Clean Energy Development Officer**

**National Grid**

Good afternoon, my name is Brian Gemmel and I am the **Chief Clean Energy Development Officer** for National Grid, here on behalf of the Company to tell you **There Is A Better Way.**

I applaud the Climate Action Council on their work on the Draft Scoping Plan. Solving climate change requires sweeping emissions reductions across all sectors – and National Grid is here to do our part.

There is an important and critical role for electrification in a net zero future. When paired with 100% renewable electricity, electric air-source heat pumps can play a part in achieving net zero for heat, and today it is cost-effective for customers who heat with oil, propane, or old electric resistance systems to convert to heating with heat pumps.

However, reliability, affordability and optimization are all issues that must be addressed in this process, and currently are not properly accounted for in the Draft Scoping Plan. For example, a comprehensive electric transmission and distribution system study is absolutely critical to understand the effect of the Plan to maintaining reliability during a state-wide transition with heavy reliance on variable renewable generators, retirements of steady combustion generators, and rapid increases in electric load from multiple sectors.

**It should be noted that the New York Independent System Operator does not agree with the recommendation from the Power Generation Advisory Panel** regarding elimination of natural gas/oil-fueled generation facilities. This retirement impact that is contemplated has not been studied and **it should be of major concern that the State’s own electric system operator does not agree with the steady generation retirements targeted in the Draft Scoping Plan.**The NYS Reliability Council and NYISO reliability planning process must be included in the analysis of T&D system reliability for the state.

Regarding affordability, the Draft Scoping Plan conspicuously avoids cost for the buildout of the electric transmission and distribution system. There is no analysis to: 1) install system controls for managing electric load flexibility; 2) reliably deliver renewable energy to load; and 3) meet peak loads resulting from electrification of heating and transportation.

Further, the Draft Scoping Plan does not address the cost for dispatchable emissions-free generation units required to provide support to variable intermittent resources, as well as voltage support and ancillary services such as black start capability - to restart the system after a blackout.

For variable renewable electricity to be reliable, it must be backed up with flexible emissions-free generation and/or long-duration storage. This draft Scoping Plan acknowledges that it is not known which technologies will be prevalent in 2040, and they do not exist today.

Sustainable life-cycle solutions for long-duration must be supported by R&D and should include use of hydrogen (a technology that could be long-duration and transportable, by leveraging the existing distribution pipe network).

Building the electric network to meet a new winter peak, that is further heightened by electrifying all heating load, is ***not*** cost-effective. Currently NYS has a summer-peaking electric system. A better approach is **leveraging existing networks –** to deliver no- and low-carbon fuels to steady generation units that will be able to back up variable output from renewables, resulting in cost-effective reliable electric supply.  A **coordinated gas and electric** decarbonization strategy is a **better way to manage the costs and feasibility risks of the State’s plan.**

**We urge the Climate Action Council to undertake studies on reliability and cost before making finagling the Scoping Plan. We also call on the Council to consider a pathway that utilizes our existing energy networks, deeply incentivizes energy efficiency and weatherization and recommend the adoption of low carbon fuel standards to support fossil free gas in New York.**

Thank you.

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