



**Climate Action Council's Public Hearing**  
**Albany, NY**  
**John Ravitz, Executive Vice President/COO**  
**The Business Council of Westchester**

I am the Executive Vice President/COO for the Business Council of Westchester (BCW) the county's largest business membership organization focusing on economic development and advocacy. Over the past twelve years one of the BCW's top priorities has been to address Westchester County's changing energy landscape.

**The BCW commissions study of impacts of Indian Point closing**

In 2012, The BCW commissioned an independent white paper titled "An Assessment of Energy Needs in Westchester County." The findings of the paper stated that the county would face huge challenges if Indian Point were to close, including.

- **Electric Rates:** Electric rates could increase by 6.3% or more if Indian Point were to close. Consumers would pay over \$374 million per year in additional electric charges.
- **Reliability:** By 2020, the probability for significant electrical outages would increase significantly.
- **Environmental Impact:** Carbon emissions, a leading contributor to global warming would increase by over 6 million tons per year- the equivalent of adding 1,00,000 more vehicles on our roads.

Due to these serious findings, the BCW sent the report to every elected official in the region with the hope that people would understand that there were too many risks to ever consider closing Indian Point. Unfortunately, ten years later, Indian Point has closed. In addition, Con Edison has imposed a gas moratorium for numerous municipalities in the southern part of the county. As predicted by our report, electric prices have spiked since the closure of IPEC and the NYISO has predicting system reliability issues in the Downstate Region starting in 2023, also a result of the closure.

As Westchester deals with these ongoing issues, New York State is now trying to implement the Climate Leadership and Community Protection Act (CLCPA), that set ambitious targets that simply put cannot be met.

## **The BCW Energy Task Force is created**

In 2019, the BCW created an Energy Task Force led by BCW member Richard Ellenbogen, an electrical engineer who worked in the Power Systems Laboratory at Bell Labs before becoming CEO of Allied Convertors in New Rochelle, NY. He has dedicated decades of his life studying how to save energy and reduce the state's carbon footprint and has taken bold actions for years. Put simply: He talks the talk AND walks the walk.

His factory features the first grid-connected micro-turbine system in the Con Edison service area. This system is highly efficient utilizing 70-75% of the energy content of natural gas his factory uses, as well as a 50-Kilowatt Solar Array. The business has operated with a Carbon Footprint 40% lower than the utility system for nearly two decades. His home in Pelham, New York is a model of energy efficiency featuring solar, geothermal and high mass radiant heat. He built it in 2002 when almost no one on the East Coast was using geothermal

Following a deep analytical dive into the CLCPA plan, over the last three years Mr. Ellenbogen and I have met with state environmental leaders regarding the several ambitious targets that the CLCPA has set which call for 70 percent of New York's electricity to come from renewable sources by 2030, the complete decarbonization of the power generation sector by 2040, and the state achieving "net-zero" emissions by 2050. These goals will require developing and deploying myriad renewable resources and technologies throughout the state, some of which do not yet even exist.

## **The BCW is deeply concerned that the CLCPA plan:**

- Will double energy costs in the state.
- Cannot be implemented in the stated timeframe with the currently available resources or in a 15-year timeframe.
- Even in a best- case scenario, it will lack sufficient generation and storage to support the proposed loads.
- Lacks consistent funding to support the creation of the renewable infrastructure that needs to be created.

Considering these very serious concerns, the BCW has joined with several members of the Climate Action Council (CAC) to urge the Council to retain an independent consultant to conduct a quantitative analysis of the potential impacts of compliance with the CLCPA on New York State's residents and businesses. A detailed assessment of such costs is critical in understanding the most effective means to achieve the CLCPA's greenhouse gas reductions targets and will be instrumental to the CAC in developing its draft scoping plan.

## **New York State needs a realistic and achievable plan**

It is imperative that New York State adopts a realistic energy plan that provides sufficient energy to run the state in the most cost-effective means.

As this new energy infrastructure is being built, the state is dismissing the important role of natural gas as a means to facilitate the transition towards a renewable-based future. Passing

legislation banning the use of gas hook ups for new construction is irresponsible at best. Almost two-thirds of New Yorkers use natural gas in their homes, leaving the dramatic increase in costs of this proposal to fall solely on the backs of property owners and tenants.

It is also critical for the state to remove obstacles to building the renewable infrastructure that will be needed to implement these new sources of energy. If the shift to new energy sources is to be successful, local municipalities will have to be prevented from using the “Not in My Back Yard” (NIMBY) argument to stop or delay renewable projects.

These vital infrastructure projects must be built in a timely manner. The energy storage projects that are needed to support the state’s system during periods of low generation are a critical component of the CLCPA have historically faced community opposition and lengthy review processes.

The CLCPA specifies the creation of nine gigawatts of peak load storage by 2040. However, the state doesn’t specify how much battery capacity would be installed. Mr. Ellenbogen’s analysis found that if the 9 gigawatts of peak load is supported by 100 gigawatt-hours of batteries, the cost estimate is between \$28 billion and \$80 billion, depending on how it is executed and will only support the system for 11 hours at peak load while heat waves and cold snaps can last for days! And without the storage, the entire plans crumbles.

### **The CAC plan: no viable way to replace fossil fuels, no funding**

Astoundingly, the CAC spent two years preparing an 860-page document of ideas with no plans to pay for them and no viable plan to offset the lost fossil fuel energy.

In his work leading the BCW’s Energy Task Force, Mr. Ellenbogen has stated the state’s green energy requirements will create massive new demands for electricity. New York has calculated that it will need to double generation capacity just to support the conversion of onsite heating. However, even while acknowledging this inconvenient truth, the state plan calls for simultaneously decommissioning existing generating plants.

New York has had the opportunity to see what has happened when other state governments draft energy proposals that are doomed to fail because the numbers just don’t add up. New York businesses and residents are still fighting to reemerge from the pandemic. Recent polling commissioned by New Yorkers for Affordable Energy showed that New Yorkers overwhelmingly believe that cost and keeping the lights on are the most important energy issue facing the state, with 92 percent saying low-cost energy and reliable electricity are top energy concerns.

### **Let’s have an honest, open discussion before it’s too late**

The BCW strongly urges New York State to engage in an honest conversation regarding how we can create a plan that will work. These honest conversations must be based on both the science and the math so that we are creating a long-term plan that will be based on realistic and achievable goals. The residents and business in New York State cannot afford to be put at risk with a plan that will seriously cause reliability issues and massive increases in the cost of energy.

The BCW has always supported and will continue to support the implementation of new renewable sources of energy to help achieve the important climate concerns that must be addressed. But we have seen the reliability issues that other states like Texas and California have been facing over the last two years that have put people's lives at risk. Why would we want those same scenarios to happen in New York State?

We can eliminate many of the above-mentioned challenges, but only if we finally engage in a robust and honest discussion of the realities of what is truly involved, and how long it will take to achieve the dream of an all-green energy future. We implore the commission to do so.