

# New York Propane Gas Association

5315 Perry City Road, Trumansburg, NY 14886

April 14, 2022

Re: Comments on Climate Action Committee Draft Scoping Plan

As New York State director of National Propane Gas Association & Legislative Committee Chairman of the New York Propane Gas Association, today I represent the over 250,000 primarily rural customers in NY that depend on low-carbon propane gas to heat their homes, heat their water, cook their food, and dry their crops.

On behalf of our dealers and customers across the state, I'm here to tell for that the propane industry believes that the climate change threat is real, and it's everyone's responsibility to do what they can to mitigate and address its effects.

Indeed, the increased use of propane has already made substantial environmental improvements in NY, as rural consumers have moved away from higher carbon fuels in recent decades. Our industry is very proud of our environmental record. We are part of the solution, not the problem.

**However, as an industry, we are very concerned that we are being mistakenly left out of NY's energy plans under CLCPA.**

As we move forward, we feel it is important that the Climate Action Council ground its efforts in solutions that are real and attainable. As such, **we feel that use of low-carbon propane needs to be included in the state's energy plan as a bridge to a low carbon energy future.**

The propane industry is continuing to invest in solutions that can make a difference, such as **renewable propane**, which has an even lower carbon intensity than traditional propane. I am proud to say that I personally attended the arrival of the first rail loads of renewable propane in NY on this past Tuesday.

In addition, our industry is genuinely concerned that the success of the draft scoping plan, as it stands, relies heavily on inflated benefits and underestimated costs. For example:

- The plan banks on dramatic changes in human behavior, attributing \$39.5 billion in health care savings to people walking and biking more.
- It assumes \$235 billion in savings by avoiding climate change impacts—but this ignores the fact that carbon emissions are a global problem.
- New York State produces less than a half of one percent of total carbon emissions. Meaningful change can only be achieved with a global response.

However, as we see it, the most significant oversight of the CAC's plan is that **it fails to seriously address grid reliability issues**. Our electric grid is aging and is already subjected to frequent outages.

A push to "electrify everything" without first making major investments to upgrade and prepare the grid for higher loads isn't just short-sighted—it's dangerous. Grid reliability is a matter of public safety. Whether it's scorching temperatures during summer or freezing conditions in winter, outages can be life-threatening.

**Higher costs, fewer choices, and less reliability.** This is the future that New Yorkers face if the plan is followed as submitted.

**Propane is an economical, flexible, and dependable fuel. It is an EPA-designated certified clean fuel with low-carbon content. It can, and should, be part of the state's long-term sustainability plans.**

Respectfully submitted,

Rick Cummings

A handwritten signature in black ink, appearing to read "Rick Cummings". The signature is written in a cursive, flowing style with a large initial "R".

National Propane Gas Association  
New York State Director

New York Propane Gas Association  
Legislative Committee, Chairman