Draft Scoping Plan Comments, NYSERDA

17 Columbia Circle

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Distinguished Members of the Climate Action Council and employees of NYSERDA,

The New Yorkers for Affordable Energy Coalition is a group of labor, industry, business and community groups – and energy experts - all working to ensure that New York’s lights stay on and the cost of energy stays low for New Yorkers.

As the Climate Action Council works to address Climate Change, it needs to ask itself an important question: Is the goal truly to lower greenhouse gas emissions, or simply to eradicate the use of fossil fuels – even if that means higher emissions and higher costs in the short term? Because many of the recommendations that have been put forth are not only detrimental to the environment, they fail to consider the cost of such drastic changes.

Let me provide just one example. The immediate environmental impact of constricting the supply of natural gas forces the grid to operate on much dirtier fuels, and that dramatically increases emissions. A recent report out of the New England ISO shows that CO2 emissions are as much as 4.5 times higher due to lack of natural gas. This is obviously worse for the environment. But it should also be noted that most of the oil-fueled power plants in New York and throughout New England are in EJ communities – and these plants emit high levels of nitrogen oxide and sulfur dioxide, which are known contributors to asthma and respiratory illness.

Second, there must be a viable option to replace what is being taken away. Without dispatchable power options, a growing renewable grid creates the potential for gaps in power supply – as your Council itself points out on page 74 your draft Plan, “Even with aggressively managed load, electric consumption doubles and peak load nearly doubles by 2050.” The Plan also points out that firm resources will be necessary to ensure a reliable system beyond 2040. The Chairman of the Public Service Commission recently said that reliance on natural gas for winter electric generation has only grown, and has outpaced available pipeline capacity. These constraints affect the ability to heat our homes and cause volatility in energy prices.

This brings me to my third and final point – as you point out in your plan, power that is weather-dependent needs a backup. New York needs to invest, not just in renewable power, but should take an all-of-the-above approach. As more intermittent forms of generation are added to the grid, it is imperative that New York keep existing gas infrastructure well maintained, and incentivize the research and creation of new dispatchable technologies including RNG and hydrogen.

Our transition to a lower-carbon economy must be done in a way that meets our present energy needs without compromising the environment or reliability in the immediate. Rather than trying to ban fossil fuel production, which is not a requirement of the CLCPA, decision makers should focus more on the best ways to reduce emissions – at a pace that will not have environmental, economic and reliability consequences for decades to come. We urge you to look at the facts, consult with energy experts, and weigh all of the potential consequences of your recommendations.

Thank you for your time and consideration of the afore mentioned items.

Best,

Michelle Hook

Executive Director, NYAE