



Northeast Hearth, Patio, and Barbecue Association

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February 24, 2022

The Honorable Kathy Hochul
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Climate Action Council
Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Dear Governor Hochul and Members of the Climate Action Council,

My name is Karen Arpino, and I am the Executive Director of the Northeast Hearth, Patio and Barbecue Association. I am offering this written testimony in opposition as written of the Climate Action Council Draft Scoping Plan.

The Northeast Hearth, Patio & Barbecue Association (NEHPBA) is a trade association representing more than 85-member companies supporting over 750 families. The vast majority of our members are independent “mom and pop” small businesses who are significant community contributors in the markets they serve across the Commonwealth.

NEHPBA recognizes the changing landscape of the energy and fossil fuel industry. We are committed to working with government officials and regulators at all levels to increase access to more sustainable and climate-centric fuel sources throughout our homes and businesses to bridge the gap from natural gas as new technology develops.

NEHPBA opposes the immediate moratorium on new gas infrastructure and of new gas service to existing buildings as well as the upcoming bans on the use of natural gas in its entirety. We encourage the Governor and the Climate Action Council (CAC) to preserve consumer choice with respect to heating and cooking options. The CAC should also appreciate the value natural gas can provide in ensuring a diverse and reliable fuel mix while facilitating the state’s energy transition. At a minimum, this draft is over aggressive and premature.

There are 5 lenses through which this plan needs to be created: climate, equity, affordability, resiliency, and economic development.

- Climate: The CAC should appreciate the value natural gas has demonstrated in reducing emissions.
- Equity: All electric heat and air puts elderly and low-income New Yorkers at risk.
- Affordability: Responsible legislation considers cost impacts on consumers, especially those in overburdened communities. This legislation will likely increase the cost of electricity as well as home construction. Additionally, this legislation will likely put out of business most of these small “mom and pop” family-owned businesses.
- Resiliency: Pipeline infrastructure is 99.9% storm proof. We need to ensure that no NY residents are left in the cold without a supplemental heat source or are stuck with energy that is not reliable or



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affordable. The gap in electricity needed to meet these goals exceeds 70% of what we have available to us in NY now. Natural gas delivers over four times the energy than electricity in peak demand.

- Economic development: Rising electricity and business costs almost always ensures economic leakage. Eliminating natural gas will double energy use with no comprehensive cost analysis.

We need to ensure that we use an all-of-the-above approach which includes natural gas, renewable natural gas, solar, wind, and emerging resources and technologies.

An all-electric heat requirement is bad policy which could fail to meet the intended goals. As New York moves toward electrification these policies significantly increase the demand for electricity, without putting into place the resources to meet this demand; nor do we have the technology to keep New Yorkers safe in the event of extended outages. Moving to all-electric heating and increasing electric demand can result in more pollution rather than less. We ask that you consider an all-encompassing fuel approach which includes the integration of renewables and allow consumers “right to choose”.

The state should not pass any bill that bans the use of natural gas, increases cost to consumers, fails in meeting reliability and capacity needs, and has no quantitative return on investment.

Renewables are intermittent. A move to all-electric heating will leave New Yorkers at the mercy of a power grid that would need to rely heavily on wind and solar. When these resources underperform, grid stability and reliability are compromised, which will leave residents in the cold. Again, gas infrastructure and deliverability are essentially stormproof. In fact, GTI Energy found that power system outages are more than 100 times more frequent than gas system outages and that extreme weather is more likely to impact power systems than gas systems¹. This means that an all-electric homes requirement could leave residents more exposed to heating system failure without a backup heat source (gas insert or fireplace) which our members provide. Allowing for the use of natural gas for heating offers safety and security to New York residents and keeps New York small businesses in business.

For the past two decades, the majority of New York’s electricity generation has been from nuclear and natural gas². With the shuttering of Indian Point nuclear power plant, the state will have to burn even more fossil fuels to keep up with the demand due to the proposed electrification policies. This will cause emissions to increase, while jeopardizing the stability and security of a diverse energy portfolio.

Gas fireplace inserts are becoming more and more energy efficient while burning low carbon fuel. Renewable natural gas and hydrogen blending technology are advancing rapidly to make the limited emissions from our products even lower. According to the New York State Greenhouse Gas Inventory, emissions from ‘transportation’ far outpaced those from residential, commercial, or industrial³. With innovation to help make these low carbon products have an even smaller footprint, it seems short sighted to completely legislate them out of existence.

¹ <https://www.gti.energy/wp-content/uploads/2018/11/Assessment-of-Natural-Gas-Electric-Distribution-Service-Reliability-TopicalReport-Jul2018.pdf>

² <https://www.nytimes.com/interactive/2020/10/28/climate/how-electricity-generation-changed-in-your-state-election.html>

³ https://assets.website-files.com/607d9aa288dfb357e5e564f7/607dc709fa81077f024a38cc_greenhouse-gas-inventory.pdf



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This plan puts more emphasis on mandates rather than incentives to avoid emissions and economic leakage. Most businesses will feel multiple negative impacts. While unintended, these policies would result in a drastic increase of electric rates and cost of living, along with the possibility of inhibiting access to more affordable sources of fuel and power. These changes would have a major impact on the most vulnerable among us.

NEHPBA is in full support of a clean environment, but hasty benchmarks and mandates that do not provide enough runway make it hard for business owners to successfully transition. We ask that you consider an all-of-the-above fuel approach and allow consumers the “right to choose”. We can achieve these goals by taking advantage of all available fuel options, this plan should not be about taking fuel sources away. We all want a clean environment, but we cannot jeopardize reliability.

NEHPBA members would like to lower emissions and have a careful, consumer-focused energy transition. We would like expanded energy efficiency as step one. We would like to say no to gas appliance bans and yes to supplemental heating sources. We would like to say yes to the use of low-carbon renewable natural gas and hydrogen for lowering emissions in heating. And to the use of the existing natural gas delivery system and electric system for a reliable, resilient energy system to better supply the increased demand of electricity.

For these reasons, Northeast Hearth, Patio & Barbecue Association strongly opposes the Draft Scoping Plan put forth by the Climate Action Council.

Thank you for considering our comments. Please do not hesitate to contact me with any questions.

Sincerely,

Karen Arpino
Executive Director
Northeast HPBA

CC: Doreen Harris and Basil Seggos