



INDUSTRIAL DEVELOPMENT AGENCY

MAKING CONNECTIONS
CREATING SOLUTIONS

May 23, 2022

Dear Climate Action Council Members:

Thank you for the opportunity to provide comments on the Draft Scoping Plan for the recently approved Climate Leadership and Community Protection Act (CLCPA). The State's established goal to reduce greenhouse gas emissions and achieve net-zero emissions is commendable and something all residents of the State should be working towards but there needs to be balance between meeting the goals set in the draft scoping plan and the negative and irrevocable damage this could have on our economy if implemented under the draft timeline.

Steuben County IDA is a leader in the State in promoting renewable energy and working towards the reduction of fossil fuel usage to generate electricity. In 2022, our County will see \$1 billion in investment for renewable generation, which is unheard of in a rural, upstate NY county. Over the course of the next 12 months, we will see investments in renewable energy from wind and solar sources and have now begun conversations on the development of green hydrogen plant which will be powered by adjacent renewable development.

We in Steuben County proudly consider ourselves leaders in the renewable energy market. When our three newest wind projects are completed, we will be generating about 808 MW from wind. In addition to wind, we have an estimated 37 MW in generation from solar, with some additional projects in the pipeline. We have other solar projects that have been canceled due to lack of system capacity.

While we are seeing substantial growth in energy investments, the County has seen a resurgence of new private sector investment throughout our communities, with national companies such as Alstom, Amazon, and LP Building Solutions leading the charge in creating new job opportunities for our residents.

As we look to continue to grow our economy through manufacturing and distribution opportunities, power becomes an issue. In a 5/5/22 WealthManagement.com article about onshoring opportunities, John Morris, President of Americas Industrial and Logistics with CBRE, noted there is "... a shortage of heavy power for manufacturing. 'If we can't find ways to improve the power grid and provide more capacity, some of these projects may lose viability.'"

Like many communities we are faced with an aging system built 70+ years ago that was not intended to handle the demands of new development and an influx of renewable generation. As noted in the New York State Power Grid study, Hornell (Steuben County) is one of the top priority "Phase 2A" projects needed to be completed across the state before the region can pursue the goals of the CLCPA.

STEUBEN COUNTY IDA

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In a follow up report to the Public Service Commission dated 3/8/22 (Area of Concern Firm Renewable Generation Assessment) NYSEG noted that, by 2030, this “Area of Concern” will contain:

- 231 out of 458 transmission lines above 70 years old;
- 7 of 9 substations above 70 years old, and 4 out of 9 substations above 90 years old; and
- 3 substations currently at risk of flooding impact (within FEMA 100-year flood zone).

The cost to upgrade the Area of Concern will total \$2.2 billion and take seven years to complete.


NYSEG’s plan requires PSC approval and assumes rate payers across the state will help pay for it. This is one of many investments through the state that need to be made in our aging infrastructure and should not come on the backs of the rate payers who will also be required to invest in their homes and the items that affect their daily lives to meet the scoping plan timeline. By many estimates this transition will result in a cost of \$35,000 per household. This is all coming at a time when inflation and supply chain issues are already placing a huge financial burden on our taxpayers.

Steuben County IDA understands and supports the goals of the CLCPA but asks that the Scoping Plan be slowed so that the infrastructure needed to support the goals can be built. We also ask that existing sources, such as natural gas, and new sources, such as methane gas conversion, be included in the plan until we are all certain that renewable sources can reliably meet the demands of every New Yorker in a cost-efficient manner.

In short, New York is not ready to implement the recommendations of the Scoping Plan’s aggressive timeline and we ask that further consideration be placed on the implementation strategy.

Thank you for your time.

Sincerely,



James C. Johnson
Executive Director