

June 7, 2022

My name is Mike German and I live in Painted Post, NY. I believe in the work of labor, industry, business, and community groups to ensure that our lights stay on, and the cost of energy stays low for all 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 much higher energy costs to homes and businesses? Many of the recommendations put forth are not only detrimental to the environment, but they also don't take into account the cost of such drastic changes. Emotions frequently run high about environmental issues, but this cannot be a debate based in emotion. We urge you to look at the facts, consult with energy experts, and weigh all of the potential consequences of your recommendations.

The immediate environmental impact of anti-natural gas decisions is forcing the grid to operate on much dirtier fuels because many gas facilities can't get access to natural gas. 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 access to natural gas. This not only is worse for the environment, but most of the oil-peaking facilities in New York and throughout New England are in poor overburdened communities – and emit high levels of nitrogen oxide and sulfur dioxide, which are known contributors to asthma and respiratory illness.

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. Hybrid heating options and utilization of the existing gas infrastructure can complement renewables. This will help ensure New York develops a reliable and affordable energy plan that won't burden those less fortunate with rising energy costs.

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 of your draft plan, "Even with aggressively managed load, electric consumption doubles, and peak load nearly doubles by 2050." In fact, peak winter load is likely to more than double due to electric heat and there are no dispatchable renewable resources. Renewable solar and Canadian hydroelectricity will likely disappear in winter.

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. Converting homes from natural gas heat to electricity will result in much greater needle peaks as the electric system will have no resources to satisfy this demand.

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.

To summarize, no one can predict exactly how long it will take to decarbonize our economy. Rather than trying to ban fossil fuel use, decision makers should focus more on the best ways to reduce emissions – at a pace that will not have dire economic and reliability consequences for decades to come.

Sincerely,

A handwritten signature in blue ink that reads "Michael German". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael German