



Climate Action Council (CAC)

Public Comment on the Draft Scoping Plan

Opposed to Scoping Plan Approval without Regional Study and Cost-Analysis

To: Co-Chairs, Doreen Harris, President, and CEO, NYSERDA and Basil Seggos, Commissioner, NYSDEC

From:

Date:

Dear Co-Chairs Harris and Seggos,

joins the Greater Binghamton Chamber of Commerce, a business membership organization consisting of nearly 800 members, in voicing our concerns with the Climate Action Council's (CAC) Draft Scoping Plan. Our business and the chamber recognize the importance of utilizing clean energy technologies and developing innovative ways to reduce greenhouse gas emissions but not at the cost of losing residents and business owners to lower-taxed states. In fact, we support affordable and reliable energy that can keep our businesses competitive while also preventing climate change. While the Climate Leadership and Protection Act (CLCPA) and Draft Scoping Plan are certainly ambitious and well-intentioned, the \$340 billion price tag includes little to no information about the state's plans to pay for these recommendations and the ways in which it will sustain long-term objectives to ensure energy reliability during a time when businesses are still recovering from a Pandemic.

Affordability

Our membership is extremely concerned with the affordability piece of this plan. The Draft Scoping Plan as currently written fails to address the current struggles of the business climate. With inflation on the rise, increased gas prices, and New York State consistently ranking among the highest taxed states in the nation, any further costs and mandates on our business owners will force them to flee to more business-friendly states. A buildout of renewable resources to this degree will cost billions of dollars, likely to fall on the backs of our business owners and taxpayers.

The Chamber has been provided various consumer cost estimates of converting natural gas appliances to electric, ranging anywhere from \$20,000-\$50,000 per Upstate New York household. Aside from the significant expense of retrofitting homes and electric vehicle purchases, businesses in industries like manufacturing will be forced to increase their energy consumption which will drive up costs substantially. As you may know, according to the US Census Bureau, between 2015-2019 approximately 18.4% of the Broome County population was living in poverty.

This is a number that cannot be ignored and is a deep concern for business owners who believe we cannot have economic prosperity without first considering the well-being of our communities.

According to the NYS Independent System Operator (ISO), Upstate NY is already at or around 90% zero emissions and Downstate NY is at 21%. With a considerably smaller population and vastly different economy, Upstate would once again foot the bill for something we have little to do with. A one-size-fits all approach is not realistic for a plan of this size, therefore, we would recommend a needs assessment to identify solutions based on a regional rather than statewide basis.

Reliability

With increased demands in electricity to supplement natural gas usage, New York State needs to ensure that the electricity grid can fully support the volume of energy being produced and transmitted. NYS Independent Power Producers (IPPNY) suggests that moving towards full electrification will require a buildout of nearly 4–4.5 times the size of our current grid. Upstate New Yorkers suffer some of the coldest winters and rely on our natural gas and propane to heat our homes which requires a project of this kind to be deemed dependable prior to investment. It must also be noted that our current system has shown to be over 99% reliable as natural gas can be stored, transported, and paid for by consumers at an affordable price. The reliability of an all-electric system is still unknown and continues to be a major concern.

For the foregoing reasons, the Chamber opposes the Draft Scoping Plan in its current form. We would respectfully request that the CAC continue to engage with stakeholders and take the following steps before implementing any of the proposed recommendations:

- Conduct a regional cost analysis study
- Assess the business climate and competitive profile in Upstate New York
- Evaluate the potential for extreme price volatility during the transition period to more robust markets for clean energy
- Address the impact of the world market disruption exemplified by the Ukraine crisis

Sincerely,