**Draft Scoping Plan – Chapter 13 – Electricity**

On page 150 of the Draft Scoping Plan is the statement: “The Climate Act requires that 70% of statewide electricity come from renewable energy sources by 2030.” It is unclear to me whether this 70% means New York’s generation or end user consumption. Transitioning from the current 27% NYS renewable energy generation in 2020 to 70% NYS renewable generation in 2030 differs markedly from NYS consumption, which I am presuming is less than 27%, just as our consumption of natural-gas produced electricity is higher than the 43% noted for NYS generation, both of which can be assumed by looking at the Environmental Disclosure Labels of the utilities in 2020:

|  |  |  |  |
| --- | --- | --- | --- |
| **2020** | **Renewable Energy** | **Nuclear** | **Fossil Fuel** |
| **NYS Generation** | 27% | 29% | 43% |
| Central Hudson supplied | 16% | 33% | 51% |
| Con Ed supplied | 12% | 36% | 52% |
| LIPA supplied | 11% | 36% | 53% |
| N Grid supplied | 17% | 33% | 50% |
| NYSEG supplied | 17% | 34% | 49% |
| O&R supplied | 12% | 35% | 53% |
| RG&E supplied | 13% | 35% | 52% |

*Compiled from 2020 NYGATS data*

What do the differences in generation and supply mean? Was the 10-16% difference

for renewable energy:

1. Wasted?
2. Sold to other states?
3. Did NY Municipal Power Agency (NYMPA) and CCAs use all of it?
4. All of the above?

I’m guessing that the 6-10% difference in fossil-fuel supplied electricity may be due to natural gas imports from Pennsylvania and elsewhere.

I am concerned that the statement on page 150: “The Climate Act requires that 70% of statewide electricity come from renewable energy sources by 2030” is ambiguous. It may mean 70% of NYS’s generation or it may mean the more important 70% of NYS’s electricity consumption. Will the CAC please spell this out more clearly to the public, the Public Service Commission, and the Load-Serving Entities to ensure that we are all on the same page?