

16 February 2022

Subject: Climate Action Council Draft Scoping Plan – Comments

Reference: <https://climate.ny.gov/Our-Climate-Act/Draft-Scoping-Plan>

Dear Climate Action Council Members,

After reviewing subject and reference, I have some concerns as expressed below:

- 1) Elimination of Natural Gas as energy option –
Clearly, this minimizes the cost to convert from NG to electricity. The impact on the lower income population will be most severe and costly. Converting our energy systems to all electricity-based sources will require sizable renewable energy development at an unprecedented scale and massive power grid expansion. And that doesn't include what will be needed for the individual conversion of countless homes and businesses across the state. Without question this will be an extremely costly endeavor that will entail tremendous resources
- 2) Cost estimates – The plan doesn't contain any meaningful consumer cost estimates for the required conversions and expansions I reference above. There are no assurances either that these costs – which experts estimate are \$25,000 to \$50,000 per Upstate New York household – won't be passed along to New York's residents. That works out to \$10 to \$25 billion in expenses for Western New York alone. This doesn't factor in the rising energy costs from the supply and demand issues likely created by the Plan's sole reliance on electricity. And, we Western New Yorkers can't afford additional expenses. Buffalo is already the third poorest city in the nation with many of our residents stretched to capacity
- 3) Electrical Supply – Do we really believe the power grid is ready to cover increased demand for winter heating and electric vehicles. Recent reports published from the NYISO state the operator's concerns about declining levels of reliability as early as 2023. Existing electric-based clean energy technologies can't meet power demand much less maintain reliability, despite the recommended phasing out of natural gas.
- 4) Regional differences - the Plan doesn't recognize the significant differences between Upstate vs. Downstate New York. Upstate would be impacted far more negatively, due to its colder, harsher weather, older, larger housing stock and comparatively lower incomes – despite the fact that Downstate's emission levels are significantly higher than those of Upstate.
- 5) Emerging reduced carbon emissions- Numerous strategies and innovations to lower emissions and still provide reliable, affordable energy to residents are some going to be deployed. By adding dual-heat and blending low and no-carbon fuel alternatives like Renewable Natural Gas and Hydrogen, making system upgrades, and leveraging the

underground – and weatherproof – distribution system there are already NG pathways to meet or actually exceed the 2019 Climate Act’s emission requirements.

- 6) Energy safety and reliability - Relying on one energy source for everything in New York from fueling our cars, heating our homes and businesses, and manufacturing our products is just too risky, particularly as we see an increasing need for energy system reliability, resilience, and quicker recovery from more frequent and significant weather events (Think Texas!).

Thank you for the opportunity to comment.

Sincerely,

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