Dear Climate Action Council:

As much as this letter serves as feedback as a concerned taxpayer in the State of New York on the Climate Action Council’s Draft Scoping Plan, it is also my offer to help improve it. I am the President of Cobey, an engineering and manufacturing company in Buffalo, NY that serves the energy industry. As a small business owner with energy industry knowledge, I hope my following notes are well received and productive.

Intro:

There is no question that something must be done. Climate change is a real issue. While the debate will continue to what degree it is man-caused or man-accelerated, it shouldn’t be denied that it is a tangible problem that we have the technology and resources to do something about and that we have a moral responsibility to act on for the sake of current and future generations.

There is a lot to unpack in the Draft Scoping Plan. The main hurdles I read are that the electrification of NYS requires a new power grid that is 3-4 times the capacity it is today, we don’t the power generation capacity to meet the demands of a grid that size, the technology required to efficiently store/distribute energy needs development, and ultimately the adoption of ‘all things electric’ will require consumer/societal habit changes that may not be accepted.

Draft Scoping Plan Comments:

The plan has a pre-disposition to wind and solar being the chosen renewables to save the day. But neither of these come without their own significant environmental impact. Both in production and disposal after they’ve served their purpose, these technologies create hazardous waste and as an example, wind turbine blades aren’t recyclable and won’t decompose.

For consideration is that any alternative has its pluses and minuses, and the scoping plan seems to avoid discussion of the negatives of solar and wind aside from some nuisance items. While the energy produced may be emission free, I assure you that the mining operation to get all the metals and minerals to make the turbines and solar panels is anything but. We shouldn’t be comfortable looking at our panels and turbines in NY while halfway around the world, people are being exploited and the environment destroyed for us to have them.

Further, blanket statements that any GHG creating power generating source is bad, fails to account for recapture technology that is prevalent in the energy industry. In many cases emissions that are captured even become beneficial in other processes or industries. We can continue to use these tried-and-true technologies, while requiring them to be more environmentally friendly, while at the same time promote new technologies that can meet our long-term needs that still need development.

Another item that struck me was the lack of discussion of how or where these technologies are currently built. Hint, not NY. There is a significant amount of money potentially to be spent by NYS taxpayers to companies outside of NYS or even the USA. I understand that the plan would be to attract companies to NY to create an industry here – but two concerns are 1) whether that can be done and still reach the timelines laid our 2) absent significant incentives due to cost of business in NY, whether they would stay.

There is a lot of discussion on how this initiative will result in economic stimulus and job creation. Is that gross or net? To what extent has consideration been made for businesses that will be forced to shut their doors altogether or those that will exit NYS because they exist in an industry that will be essentially prohibited? What is the plan for companies that are already struggling in NY to be competitive with other states or low cost countries that have to bear additional costs of investing in this plan? The draw to NY has never been the cost of doing business here – we consistently rank poorly in this category. Increasing energy costs as well as taxes/fees to pay for this initiative may very well put people out of business and put the state in an even worse position. Furthering this point, other entire industries are already slated to go out of existence by design, gas stations, gas utilities, power plant operators – do the numbers work out to a net increase in jobs? The new Plug Power gigafactory comes to mind in this conversation. Headquartered in NY, they’ve committed to expand the hydrogen fuel cell production in NY (with NYS financial incentives). The draft scoping plan effective says hydrogen isn’t part of NYS’s plan. Conflicts like these need to be resolved in order to retain these growing companies.

While this is a multi-decade initiative, there are actions that can be take today with the equipment and infrastructure in place, to lesson our impact on the environment. However, there doesn’t appear to be much consideration given to a phased approach. I would argue that the rapid pace of technology advancement and even the technology required for this project to be successful demand that we have multiple paths running in parallel. One of the first would be to understand what retrofits we can do today to minimize our damage while we work on the long-term solutions. firmly believe 2050 will look considerably different than what this plan lays out and flexibility is needed to adapt/adopt to the best along the way, fully recognizing that choosing the best solution may include considerations beyond GHG emissions.

In conclusion, we need to act. While there is a lot of good in the plan, I don’t think it describes well enough the costs, what industries will lose jobs and how many. It also, doesn’t estimate succinctly how many jobs will be created and at what cost to the taxpayers those will come. The plan makes broad statements on how this will benefit all NY, but it will not benefit everyone equally and some will wait 30 years or more to see their benefit. The technology identified to make the plan work has been demonstrated to be less reliable than other alternatives. The plan shouldn’t disqualify any technology. We don’t know what the next 30 years of advancements will bring and should keep our options open. Finally, the impact on business cannot be understated. If an undue burden is placed on the business community to pay for this initiative that causes them to become uncompetitive, not only will this plan fail, but NY as a whole will suffer the consequences.

I’ve omitted pages of other thoughts/comments just as I’m sure the scoping plan isn’t exhaustive. There are practical considerations like someone driving in from out of state trying to find a gas station when there aren’t that will need to be addressed in time. If I can be of further help, I’m a concerned citizen, a small business owner, and am passionate about this topic.

Thanks,

Mike Durkin

Additional Questions (inexhaustive):

* Due to transmission losses, how much more electricity will be required to be produced and stored versus projected demand?
* Why does the plan assume emissions from (renewable) natural gas power generation cannot be captured?
* What is the environmental impact of building out an electric grid to meet the requirements? Mining of metals for wire, coatings for the wire, etc. all have an impact.
* What is the environmental impact of building the solar panels and wind turbines?
* How will the spend on “green” technology be kept in NYS?
* There is a statement about the grid, run on renewables, being cleaner, more affordable and more reliable. Based on current costs (July 2022) and the investment needed – is that true today? How many years is the ROI to make it true?
* How much incremental spend is required on this on an annual basis. NYS has considerable debt emerging from COVID with depleting reserves (a balanced budget with potentially overly optimistic assumptions).
* Workforce shortages present a tangible problem today, should this plan account for the potential inability to staff the development?
* The plan has significant targets for spending in disadvantaged communities. This should be a must – but how is the target spending broken down between one-time spends on housing improvements, etc. and longer-term generational improvements like workforce development training and job opportunities?
* How much of home energy efficiency is tied to the structure efficiency (insulation, windows, and doors) versus the HVAC equipment efficiency? Is the priority in the plan to address the larger culprit?
* There is a statement that everyone benefits from a clean energy economy in NY, but clearly not everyone will equally. Who are the primary benefactors of building out/replacing the electric grid, what companies have been targeted for wind/solar tech, who stands to gain financially from the targeted investments?
* Do current EV production rates support the goals?
* It would appear the CAC is against hydrogen, nuclear, and (renewable) natural gas. These are technologies that appear to be cornerstone to the future in many other green economies – why aren’t they included in this plan?
* Would a recent example of the spending in this plan be akin to Solar City in Buffalo, NY? That doesn’t appear to have worked out as intended – what went wrong?
* Who is responsible for the closure of power plants, remediation of gas stations, remediation of underground gas piping, etc.? What’s the anticipated cost of all those activities?
* What consideration has been made for businesses that need to run on natural gas? Restaurants come to mind.