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Zip	13090
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Check all topics to which your comments apply	Chapter 12. Buildings
Comment (2000 characters maximum)	<p>Attached are my comments on Draft Scoping Plan Residential Heating Electrification Estimates. In my opinion, home electrification is a primary concern for New Yorkers given the importance of affordability and the impact to every household. Accordingly, I spent a lot of time trying to replicate the costs to retrofit existing furnaces with heat pumps as documented in these comments. I found that the existing documentation is too incomplete to be able to reproduce the cost projections.</p> <p>These comments found that a primary driver of home heating electrification is the building shell cost. Given its importance all the assumptions used to generate the numbers must be available but there is insufficient documentation. The Draft Scoping Plan claims only 26% of residences need deep shell upgrades. I estimate that more than half actually will need to have deep shell upgrades using a more refined climatology. I estimate that the entire building sector component cost is \$230 billion relative to the reference case in the Draft Scoping Plan. I calculated that just the residential retrofit heat electrification costs range between \$259 billion and \$370 billion using one methodology and between \$295 billion and \$370 billion based primarily on the number of residences that need deep building shell upgrades.</p> <p>I conclude that all of the material described in the section “What needs to be provided” must be publicly available to fulfill the obligations of the Climate Act and ensure that cost information necessary to determine whether PSC mandates are met. The Integration Analysis documentation has to be supplanted and the Draft Scoping Plan needs to be revised to specifically address these obligations</p>
Upload File(s)	https://seam.ly/y4MHcsCy Caiazza Personal Comment on Draft Scoping Plan Residential Heating Electrification Estimates.pdf