## Electricity

Thank you for this opportunity to provide comments on the draft scoping plan. As required by New York’s nation-leading climate law, the CLCPA, climate and environmental justice must be the driver of the outcomes of this scoping plan. To achieve this, please ensure that the following recommendations on the Electricity Sector are included in the final draft:

* By 2040, New York State is required to reach a zero-emissions electric grid. The Final Scoping Plan must avoid recommendations that will perpetuate the combustion of fuels to generate electricity.
* I agree with the draft plan’s assessment that the State should make proactive and timely investments in local transmission and distribution infrastructure and associated cost-sharing associated with the utilities in these upgrades. The Final Scoping Plan will need year-by-year permitting targets to substitute existing fossil fuel power plants with large scale renewable energy to operationalize this (plus battery storage and efficiency). A moratorium on new fossil fuel plants will be needed quickly to ensure the many fossil fuel power plants already reaching their end of life are not replaced by more fossil fuel power plants.
* Provide a schedule to sunset fossil power plants that are outside the public grid.
* By 2050 our electricity needs will double, since we will be heating our homes and powering our vehicles with renewable electricity, we’ll need a 7x increase in solar capacity, a 10x increase in wind, and a 10x increase in storage. The state must make renewable energy siting a more streamlined and simplified process. The final plan should address obstacles to renewable energy siting which will require full staffing of state agencies like the Office of Renewable Energy Siting, and a public education campaign on the benefits and opportunities of clean energy.
* The draft plan’s “Explore Technology Solutions” section is largely problematic in its promotion of expanding renewable natural gas, green hydrogen, and nuclear as answers to long duration storage. I join the CJWG in expressing strong concern about the emerging technologies mentioned plus waste-to-energy and bioenergy, as they can lead to the production of more greenhouse gas emissions and/or co-pollutants and are inherently inefficient or unsustainable.
* One component of the strategy is to define "emission free." Several business initiatives have made claims to be using renewable fuels or low-carbon fuels. In some cases burning waste has been described as recycling. The definition must result in zero GHG outputs and exclude fuels that count displaced emissions to balance their own GHGs. The objective of the DSP must remain reduction then elimination of GHGs, not substituting GHG reduction on one activity for continuing emissions in another. Offsetting measures that allow continuing GHG emissions are greenwashing that must be avoided to achieve CLCPA objectives.
* I am alarmed at the expansion of “Proof of Work” cryptocurrency mining in NY State. It is an energy-hogging industry that causes thermal pollution of our precious waters. This industry does not contribute significant jobs in NY or any other economic advantage that cannot be obtained by using low energy alternatives. For these reasons, NY should place a moratorium on cryptocurrency.
* I support the Climate Justice Working Group proposed Utility customer bill of rights.