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Draft Scoping Plan Comments

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I am writing in general opposition to the proposed plan by the Climate Action Council, and more specifically to the prohibition of the use of natural gas and other fossil fuels for home use beginning in 2024. As a New York resident and retired engineer, I am familiar with home heating and the various options available in our state.

It seems reckless and unwise to limit residential heating options exclusively to electric heat pumps and resistance heating. Given the unreliability of electric service during winter storms, there should be alternatives available to provide heat during such situations. Even with improvements to the electric grid and delivery infrastructure, it is unrealistic to believe there will be no outages, especially considering the variable nature of solar and wind power. Therefore there should be backup energy sources available to the homeowner to provide heat and emergency power in such instances.

Assume that a new home is built in accordance with the proposed rules, incorporating 100% electrical energy for heating and lighting. In such cases it would be wise to provide an emergency power generator for prolonged outages. The most favorable and cleanest fuel for such an emergency generator would be permanently connected natural gas, which is immediately available when needed. Unfortunately, this option will no longer be available with a ban on new natural gas hookups. This would also apply to propane powered generators if such hookups are also banned.

It also seems unreasonable for such bans on natural gas use be made on a state by state basis, especially with New York being the first and only. While reducing carbon emissions is a worthy goal, such reduction is only effective if it is applied uniformly across our country and internationally. There is a worldwide market for gas and other fossil fuels. Even if New York was to eliminate their use entirely, the fuels displaced would certainly be sold and consumed elsewhere, with little or no net reduction in global carbon emissions. Until some consensus is reached across the USA and internationally, restrictions on fossil fuel use by New York State alone will only serve to make us less economically competitive to states where such restrictions do not exist.

I am also concerned regarding the lack of consideration of additional nuclear power in any of New York's low carbon electricity generation proposals. Wind and solar cannot be depended upon to provide constant baseload power, and hydroelectric generation is limited and not sufficient to meet the need. Additional modern nuclear generation is the obvious solution, but it seems political considerations and the irrational fear of nuclear power have succeeded in suppressing this long term option.

Consider that Indian Point, generating 2000 MW of essentially carbon free electricity was prematurely shut down and replaced by three natural gas fired plants which greatly contribute to carbon emissions.

Restrict natural gas use to homeowners, while at the same time commission new natural gas power plants. How does this make any sense?

In conclusion, I urge the Commission to reconsider its plan and take a more balanced approach to the reduction of greenhouse emissions. Provide incentives for electrification and greenhouse gas reduction, yet not punitively restrict access to other forms of energy so necessary for reliability, resiliency and affordability to our citizens.