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June 30, 2022

Draft Scoping Plan Comments
NYSERDA
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(Transmitted via email)

The following comments are submitted for the "New York State Climate Action Council Draft Plan" ('the Plan')[1] based upon Plan review and cited expert critiques of the current draft.

The National Propane Gas Association (NPGA) is the national trade association representing the U.S. propane industry. Our membership includes small businesses and large corporations engaged in the retail marketing of propane gas and appliances; producers, wholesalers, and dispensers of propane; manufacturers and distributors of propane gas appliances and equipment; fabricators of propane gas cylinders, tanks, and trucks; propane transporters; and services providers of all types. With a membership of approximately 2,400 companies in all 50 states, 35 affiliated state or regional associations, and members in 19 foreign countries, NPGA represents every segment of the propane industry.

Key strategic considerations are missing from the Plan that are essential to a properly conceived strategic approach and include the following:

- Outcomes to the citizens of New York State from "no action" on a unilateral implementation of the Plan should be included. In view that "thinking globally" with respect to climate change and "acting locally" (i.e., at State level) on greenhouse gas (GHG) emissions may have no effect on global climate temperatures, the alternative of "no action" should be assessed. "No action" is a prescribed analysis alternative under the National Environmental Policy Act (NEPA)[2] whereby the effectiveness of any measure, environmental or developmental, can be more precisely measured. The State should exercise that practice here and within the Plan.

- As pointed out by other commentators previously,[3] the feasibility of meeting New Yorkers' heating needs by transitioning heat pumps for 100% of citizens is infeasible from the standpoint of the appliance industry serving this required demand, training and qualifications of technicians to install

[1] *New York State Climate Action Council Scoping Plan (CACSP), Draft, "Chapter 5. Overarching Purpose and Objectives: 5.3 Summary of Strategies."*

[2] "The National Environmental Policy Act of 1969 (83 Stat. 852) [42 U.S.C. 4321 et seq.], as amended.

[3] Hanley, J, "Green Scheme: The Climate Action Council's Climate Transition Cost Analysis," Empire Center, November 2021, p. 3.

these systems, and maintaining affordable consumer costs in the face of the induced market demand and marginal demand and supply pricing.

- Similarly, the objective of altering 92% of the state's building stock by 2050 is infeasible since New York City alone would require alterations to 31,000 building sells annually, raising questions of sufficient construction labor availability[4] and competitive run up in construction costs to meet other construction demand.

- Reviewers have also questioned the cost-benefit calculations used to justify the Plan and its attribution of national benefits it defines to New York measures, especially since New York contributes only 3% of U.S. greenhouse gas emissions and 0.4% of global emissions.[5]

- Failure of the State to achieve its objectives, ranging from inability to make the transition to renewable electricity at one end of the value chain to the conversion on existing fuel gas customers to electricity at the other end of the value chain, should be addressed through contingency planning and assessment. Given the criticisms to follow of the objectives presented in the Plan, the need for contingency planning is especially acute. Failure to meet its objectives might be rationalized as progress in meeting climate objectives, but it is likely that the burdens of unsuccessful efforts will fall inequitably on different sectors of the State's citizenry. This needs to be anticipated in the Plan, and remedies for inequities should be discussed.

- A range of alternative program options, including utility-based and fuel supplier-based voluntary incentives and programs to reduce carbon emissions should be included in the planning process and evaluated on a basis of cost effectiveness to consumers and the State. These options would be especially important in the building retrofit market where "command and control" measures currently recommended in the Plan have never been tested and that may not stand up to legal challenges. Cost effectiveness of Plan options (e.g., in terms for discounted costs over time for combustion-based carbon emissions from fuels and unburned methane from leakage and combustion "slip") should be rigorously and transparently analyzed. The importance of cost effectiveness and transparency have been raised in economic expert commentaries on the current process for generating the Plan.[6] While it appears that the Council has increased the transparency of its analytical approach, the lack of application of cost effectiveness criteria on Plan alternatives is notable.

- Analysis should provide estimates of total economic costs as they are paid by energy consumers, most notably by utility ratepayer who undoubtedly be called on to pay a major share of transition costs, particularly for retrofit programs. While additional ratepayer costs are likely to be spread out across the ratepayer base to a great degree, all State citizens should expect and receive the Council's best estimates of how monthly utility bills are likely to increase. According to one estimate, New York residents might expect to pay an additional $10,000 to $15,000 each over the next 29 years to implement the Plan's projected total cost[7] and before escalation with much of this additional cost coming as increases to electric utility bills.

[4] Ibid.

[5] Id, p. 6.

[6] Id. pp.4-7.

[7] Id. p.2.

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Furthermore, the Plan makes a variety of unsubstantiated claims, proposals, and assumptions of future outcomes of proposed measures and the overall effects on the State economy and its citizens:

- With respect to the Plan's discussion of achieving "climate justice,"[8] the Climate Justice Working Group's emphasis on defining "disadvantaged communities" is unduly biased toward speculative justifications on "public health effects, environmental pollution, and impacts of climate change" at the expense of "certain socioeconomic criteria" as called for in the Plan but that are themselves imprecisely defined. Of specific concern among these "certain socioeconomic criteria" are the anticipated costs of increasing reliance upon grid electricity in the retail electricity market of New York State, which represents some of the highest electricity rates in the U. S. In addition to subjecting "low- and moderate-income households" as called for specific consideration in the Climate Act to higher monthly cost for heating services, these consumers, which include a high percentage of residential propane customers, would bear disproportionate direct costs of replacement of fuel gas appliances over time to electric appliance replacements, many times involving electrical supply costs in modifications to the building structure. The likelihood that direct subsidies, such as the proposed paltry Climate Justice Fellowship fund of $6 million, would neither cover all of the accompanying costs nor alleviate shared economic burden borne by others among the State's population financing the fund. As a consequence, the Advisory Panel's feedback to the Climate Justice Working Group to "ensure that strategies enhance consumer protection and place emphasis on a just transition" in energy efficiency and housing policies, is at best aspirational. "Environmental justice" programs and policies typically call for including consideration of costs to disadvantaged consumer groups in their mission statements but rarely take them into full account. The difficulties in converting low- and middle-income families to high-cost electricity demands will be especially acute in New York State.

- Proposed requirements to transition away from fuel gases in new construction and appliance replacement directly conflict with the Just Transition Principle, "Equitable Access to High Quality, Family-Sustaining Jobs"[9] by rendering obsolete trades supporting sales and installation of fuel gas appliances, as well as affecting the almost 3,000 New York citizens that are employed to transport, store and deliver propane to the nearly one million customers within the state[10]. This employment infrastructure, which involves specialized technical skills, high paying jobs and frequently federal licensing requirements, has been an engine of economic growth in New York State for decades. No guarantees can be offered that State employment income, collectively or across similar job categories, would be equitably compensated for during a transition away from fuel gas consumer appliances to electric appliances. Mitigating measures proposed in the Scope Plan under "Direct Displaced Worker Support," et. al., are without specificity and lack specific discussion of State resource commitments. In contrast, implementation of the Plan will have direct, profound, and quantifiable negative impacts. Permit denials for NRG & Danskammer generating plants will have eliminated 1,100 good jobs and two major sources of 100% clean power by 2040.[11] Since gas and oil

[8] CACSP, Draft, "Chapter 6. Achieving Climate Justice: 6.1 Climate Justice and the Climate Act, 6.3 Prioritizing Measures to Reduce Greenhouse Gas Emissions and Co-Pollutants in Disadvantaged Communities, 6.4 Barriers and Opportunities Report."
[9] CACSP, Draft, "Chapter 7. Just Transition: 7.1 Just Transition Principles, 7.3 Measures to Minimize the Carbon Leakage Risk and Minimizing Anti-Competitive Impacts, 7.4 Principals, 7.6 Jobs Study."
[10] National Propane Gas Association, "Propane's Impact on Economy," https://www.npga.org/wp-content/uploads/2020/06/NEW-YORK__Propane-1-Pager_2020.pdf
[11] Murphy, J., United Association, "What are the Real Costs of the CLCPA?" New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #4.

resources currently make up more than two-thirds of the energy downstate and one-third statewide overall,[12] full Plan implementation will entail phase out 66 natural gas plants and 3 nuclear, with "massive" losses of middle-class jobs, harming the State middle class and lower income energy workers.[13]

- While "minimizing anti-competitive impacts" is cited as a goal of "just transition" efforts, no consideration is given to the anti-competitive consequences of eliminating consumer choice of fuel fired appliances and equipment. Anti-competitive pressures would arise from both the loss of fuel choice and selection of appliances and equipment currently manifest in the New York State economy.

- Coverage of public health benefits unduly and unsubstantially attributes "benefits" from elimination of direct use of fuel gases in homes and businesses. Indoor air quality (IAQ) claims[14] are misapplied regarding installation and use of residential fuel gas appliances and health issues associated with combustion emissions generally. Space heating and water heating appliances, under State law and prevailing building codes and standards, are vented to the outdoors, and modern building envelope and ventilation requirements address a host of IAQ issues associated with residential construction and occupation, one of the least of which are combustion products from vented combustion appliances. Data cited in the Plan do not apply to new construction and modern combustion appliances generally because of these changes to building envelope requirements and appliance and equipment standards used to ensure their safe operation.

  Cook stove combustion emissions, which are not required to be vented to the outdoors, are regulated by national consensus standards for carbon monoxide, and analyses of combustion emissions for the second principal combustion product of concern, nitrogen dioxide, have been shown to be well below national health standards under controlled measurement conditions. The studies cited in the Plan as evidence of contributing to poor IAQ from combustion emissions all lack fundamental information connecting emission rates for the combustion products of concern to actual occupant exposures produced by the operation of appliance burners and valid associations of exposures to health effects. The association of use of combustion cooking stoves and asthma is especially egregious since the principal combustion product cited, nitrogen dioxide, is not identified by cognizant federal health agencies as either producing asthma or asthma attacks in pre-asthmatic individuals. References to low-income residential occupants conflates asthma development and symptoms with *bona fide* environmental causes, in all cases without measurement of actual combustion product exposures. Lastly, the arguments about poor IAQ and health effects due to cook stove combustion emissions ignores the principal source of cooking emissions that come from all cook stoves, fuel gas and electric: cooking effluent. The preponderance of scientific literature related for modern societies and cooking practices identify cooking effluent as the source for a wide variety of potentially unhealthful concentrations of IAQ pollutants, including but not limited to particulate matter in all size ranges relevant to human health effects.

[12] Donohue, G, Independent Power Producers of New York (IPPNY), "Benefits & Shortfalls of the Climate Action Council's Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #5.
[13] Murphy, J., United Association, "What are the Real Costs of the CLCPA?" New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #2.
[14] CACSP, Draft, "Chapter 8. Public Health: 8.3 Sector-Specific Health Co-Benefits of Climate Policies."

- The Plan's definition of its scenario designs[15] does not account for contingencies in which renewable electric power capacity does not meet the Plan's goals. Uncommitted fossil fuel-fired generating capacity, needed to meeting peak load demands, is not considered available for greater use during non-peak load periods or where renewable capacity is not available: (1) for timely dispatch to serve the grid, (2) is not producing power during unfavorable weather conditions such as low wind and solar incidence conditions, or (3) is not online due to delays in commissioning or other technical issues leading to outage. During those periods, fossil fuel fired power serving the grid will product GHG emissions up to three times greater than for the same heat input for fuel consumption directly at a building point of use. This relationship would hold for imported power from out-of-state fossil fuel fired generation, which could have the same GHG footprint. The scenarios, starting with the Reference Case, should include capacity utilization and dispatched flows from instate and out-of-state sources over the forecast period.

- Valuations of avoided GHG emissions and health co-benefits[16] should be excluded from the benefit-cost assessment. In a recent federal court case in the Western District of Louisiana, it was found that social cost of carbon calculations and the work of the federal Interagency Working Group on Social Cost of Greenhouse Gases are restrained from being "adopted, employed, treated as binding, or relied upon" [*sic*] in accounting for benefits of reducing climate-related emissions.[17] In response, the Office of Information and Regulatory Affairs (OIRA) of the U. S. Office of Management and Budget has initiated a review of federal agency rulemakings regarding exclusion of social cost of carbon (SCC) calculations in regulatory rulemakings. While the District court decision has been overturned for the time being, the initial challenge is being raised again. The State of New York should avoid including SCC estimates in this rulemaking while the federal government reconsiders their use. Use of health co-benefits from avoided cost in the general benefit-cost calculation is highly questionable since agreement on methods for the appropriate avoided cost calculation procedure has not been pursued within the context of the Plan. The Plan should rely upon more objective and transparent benefits and cost accounting. The Plan presents no comprehensive cost analysis on how to pay for any of the recommendations including major technological changes among energy end users or infrastructure, specifically including:

    - Geothermal/heat pumps
    - Electric vehicles
    - Home appliances
    - Grid electrification
    - Expansion transmission, renewables and energy storage.[18]

[15] CACSP, Draft, "Chapter 9. Analysis of the Plan: 9.2 Scenario Design."
[16] CACSP, Draft, "Chapter 10. Benefits of the Plan: 10.2 Integration Analysis Benefit-Cost Approach, 10.3 Key Benefit-Cost Assessment Findings, 10.4 Health Effects."
[17] State of Louisiana, et. al., v Joseph R. Biden, Jr., et. al., United States District Court Western District of Louisiana, Case 2:21-cv-01074-JSX-KK, February 22, 2022.
[18] Donohue, G, Independent Power Producers of New York (IPPNY), "Benefits & Shortfalls of the Climate Action Council's Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #8.

While the Plan's "Sector Strategies"[19] focus upon replacement of natural gas and oil energy forms, deficiencies in documented claims and unsupported proposed actions in many cases also apply to end use of propane, particularly in the buildings sector. Notably, moratoria on "New Gas Infrastructure," which is not a Council-wide recommendation, would prohibit propane in new homes in 2034, prohibit "traditional" heating systems in existing homes in 2030, ban use of natural gas (and propane) dryers, stoves, etc. in homes by 2030. What is not covered in the Plan for buildings are a number of alternatives for reducing fossil fuel consumption and associated carbon emissions that would assist the State in approaching its climate goals without draconian disruption of current and future consumer options. Specifically missing from that Plan are the following:

- Evaluation of an 'all of the above' approach for decarbonization utilizing both natural gas and electric systems to achieve emissions reductions more affordably and reliably through --
    - Widespread building energy efficiency emphasizing building envelope
    - Increased dissemination of hybrid dual-fuel (electric and gas) heating and cooling
    - Leveraging the natural gas delivery system incorporating low and no-carbon fuels
    - Distribution of renewable natural gas and propane
    - Distribution of "Green Hydrogen"
    - Other efforts toward decarbonizing the natural gas network in near-term.[20]
- A full assessment of consumer affordability. Converting an existing gas home in upstate NY to all electricity (based on a natural gas house conversion) has been estimated by or presented to the Consumer Energy Alliance (CAC):
    - $20,000 - $50,000 per dwelling unit to convert from fuel gas to electricity end uses, presentation to the CAC
    - $35,000 to convert based upon CAC analysis
    - $40,000-$50,000 to convert based upon an internal analysis for an older Western New York single family home.[21]
- Full accounting for regional differences and regional solutions between Upstate and Downstate New York consumer considerations, economic circumstances, and climatic conditions. The Plan would be more burdensome for western New Yorkers, given that weather is 56% colder, 94% of energy used on the coldest western New York winter day is fuel gas, Upstate is populated by an older and larger

[19] CACSP, Draft, "Chapter 12. Buildings: 12.1 State of the Sector, 12.2 Key Sector Strategies."
[20] DeCarolis, D., New Yorkers for Affordable Energy, "How Will NY Achieve Its Climate Act Targets? A Look at the Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #5.
[21] DeCarolis, D., New Yorkers for Affordable Energy, "How Will NY Achieve Its Climate Act Targets? A Look at the Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #5.

building stock. In all, burdens fall more heavily on Upstate residents while Downstate produces more emissions.[22]

Within the "Electricity Sector" strategy,[23] several crucial considerations make the Plan unworkable in the near-term and throughout the planning timeframe:

- New York's grid operator (NYISO) has pointed out that quick-start power options are essential to maintaining electricity supply reliability. Renewable electricity generation alone does not satisfy this need.

- State power reserves are thin, providing no "wiggle room" for meeting peak demands on either very hot or very cold days when peaks are high or when generating units go offline. As recently reported in the New York Daily News:

  "*New York City is particularly at risk. If statewide temperatures reach the high 90s, what's known as a 'zero-margin condition' can be expected to occur, leading to shortages of power and partial or total blackouts in the city."*[24]

- The New York State Energy Research and Development Administration (NYSERDA) points out that electrification of building end uses and transition to electric vehicles sought under the Plan would increase electric demand by 65 to 80%.

- No consensus appears to have been reached on what qualifies as "Zero-Emission Dispatchable Technologies" for 2030 and beyond, including consideration of nuclear power.[25,26]

- In the meantime, a crucial need remains for continued availability of nuclear facilities through 2029.[27]

- In all, electrifying buildings and transportation in New York requires an electric system build-out of 4 to 4.5 times the current energy grid capacity.[28]

- In contrast, the present situation points to a reduction in traditional electricity sources:

  - The Indian Point Nuclear Plant has been permanently closed.

  - As discussed above, the NRG Energy and Danskammer proposals to upgrade natural gas turbine plants have not been approved.

[22] DeCarolis, D., New Yorkers for Affordable Energy, "How Will NY Achieve Its Climate Act Targets? A Look at the Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #8.
[23] CACSP, Draft, "Chapter 13. Electricity: 13.1 State of the Sector, Key Sector Strategies."
[24] Hook, M., New Yorkers for Affordable Energy, "Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #4.
[25] Donohue, G, Independent Power Producers of New York (IPPNY), "Benefits & Shortfalls of the Climate Action Council's Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #5.
[26] Hanley, J, Empire Center, "Sleepwalking Into Darkness: New York's Bleak Energy Future?" New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #4.
[27] Donohue, G, Independent Power Producers of New York (IPPNY), "Benefits & Shortfalls of the Climate Action Council's Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #7.
[28] Donohue, G, Independent Power Producers of New York (IPPNY), "Benefits & Shortfalls of the Climate Action Council's Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #8.

- FERC may not permit the proposed Iroquois Gas's gas compression project.
- Existing nuclear plants are only permitted for continuing operation until 2029
- Many existing gas and dual-fuel turbines are approaching retirement age.
- 25,000 MW of fossil-fuel generation will need to deactivate to meet Plan targets, according to the New York Independent System Operator "2021-2030 Comprehensive Reliability Plan."[29] According to one group of experts, carbon fuel generation is retiring faster than new resources are being developed, and the New York Grid may cross a "tipping point' where generation sources would not reliably serve electric demand.[30]

- Even at maximum expansion of wind, solar, and waterpower sources, New York would still require 30 gigawatts (GW) of alternative power by 2040 according to NYISO or 60 500 megawatts (MW) clean power plants on top of all renewable power developed for the State.[31]

In its "Economy-Wide Strategies" discussion,[32] the Plan describes three options for carbon management involving carbon pricing, implementation of an auction system for allocating carbon credits, or a clean energy supply standard. However, no specific proposals are forwarded in the Plan, and instead the State asks for public comments, presumably on specific approaches. As such, it is unclear whether and how the State would implement such state-wide practices and is ill-timed with the issuance of the Plan. Unless and until the State has a specific proposal, it should withdraw its presentation on this subject matter.

Discussion of energy resilience in the Plan[33] is fundamentally too narrow in scope to address real consumer needs. As a general rule of energy resilience, reliance upon any one form of energy and in particular grid-supplied electricity reduces resilience of consumers in meeting energy needs, particularly for heating services. The State should encourage promotion of measures that increase energy resilience at the consumers' premises, including but not limited to having hybrid appliances and equipment that use both fuel gases and electricity. While heat pump technologies have efficiency advantages for space and water heating, their operation during peak demand periods requires supplemental heat. In such applications, an electric heat pump paired with a fuel fired supplemental heat source has inherent resilience value.

In terms of "Future Work" for Plan development,[34] the breadth of the Plan needs to be expanded to consider the following resources, end use applications, and policy options. Efforts ought to include:

- Technical and economic evaluation of low-carbon fuels such as renewable propane and other forms of bioenergy and the "green hydrogen."

[29] Hanley, J, Empire Center, "Sleepwalking Into Darkness: New York's Bleak Energy Future?" New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #5.
[30] Hanley, J, Empire Center, "Sleepwalking Into Darkness: New York's Bleak Energy Future?" New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #6.
[31] Murphy, J., United Association, "What are the Real Costs of the CLCPA?" New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #8.
[32] CACSP, Draft, "Statewide and Cross-Sector Policies, Chapter 17. Economy-Wide Strategies: 17.1 Overview."
[33] CACSP, Draft, "Chapter 21. Adaptation and Resilience: 21.1 Adaptation and Resilience Overview, 21.2 Key Strategies."
[34] CACSP, Draft, "Chapter 24. Future Work."

- Analysis of Investment in development of "zero emitting resources," although lower emitting fuels will go far to assist the State in meeting its emissions goals.

- Full consideration of carbon pricing as an option and as an alternative to "command and control" elimination of fuels.[35]

But future planning considerations in the draft Plan fall short. The following are deficiencies point out in one analysis:

- The Plan does not call for new nuclear generation capacity, although it leaves open the prospect of continued operation of existing nuclear plants.

- It suggests advanced fuels such as green hydrogen and renewable natural gas might fill the reliability gap" if scalability, feasibility, and environmental impact and air quality issues can be addressed," but it provides no discussion of technical challenges on these issues going forward. The big "if" facing these alternatives is that it is not known if any advanced fuel options will be proven technologically or economically feasible at utility scale by 2040[36]

- Energy storage on the necessary scale to meet the Plan targets and technical needs to supplement renewable electricity sources is not realistic. The Plan says system will require energy storage "from minutes to hours, days, weeks and even longer…", but this is a vague qualitative characterization of what is needed to maintain reliable electrical supply.

- In fact, no scenario for creating such vast amounts of storage is described or justified on technical and economic grounds.[37]

NPGA Final Comments

NPGA views the State of New York's efforts to unilaterally control carbon emissions for mitigating climate change to be founded on flawed reasoning based upon a presumption that "thinking globally and acting locally" will have an effect on global temperatures. At a very minimum, New York should be coordinating efforts with neighboring states so that more impact on U. S. carbon emissions could be credited and helping to eliminate "free rider" effects of other jurisdictions that do not apply the same mitigation measures and incur the same economic impacts and dislocations. Of course, global benefits would still be questioned, but at least New York could demonstrate successful (and unsuccessful) experience to serve as a more general model for policy options.

A set of "all of the above" alternative pathways ought to be a part of the Plan development process. This would require a move away for a "command and control" orientation and toward incentivizing measures that reduce carbon emissions in an efficient and equitable way. Alternative pathways could be primarily based upon financial incentives and carbon pricing at one end of the spectrum or more

[35] Donohue, G, Independent Power Producers of New York (IPPNY), "Benefits & Shortfalls of the Climate Action Council's Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #7.
[36] Hanley, J, Empire Center, "Sleepwalking Into Darkness: New York's Bleak Energy Future?" New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #9.
[37] Hanley, J, Empire Center, "Sleepwalking Into Darkness: New York's Bleak Energy Future?" New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #10.

technological and economically feasible transitional measures at the other. Any set of "all of the above" alternatives would made up of three building blocks, which could by some estimates yield a 93% emissions reduction in the New York "region" and through a less burdensome way for consumers by promoting:

- Widespread energy efficiency that emphasizes weatherization
- Dual-energy heating and cooling systems
- Use of the existing fuel gas infrastructure and business and human resources to incorporate low carbon fuels.[38]

NPGA fundamentally disagrees with the timeframe presented by the Plan based on its infeasibility (according to comments presented above) and the enormous inefficiencies that would be introduced when the collective Plan measures are implemented, regardless of the prospects for success. Here, NPGA supports timeframe development based upon technical and economic feasibility as the primary drivers for Plan development and as the first step of a rational planning process.

Finally, NPGA agrees with the New Yorkers for Affordable Energy on central questions of meeting the Climate Act goals:

- NPGA agrees with efforts to lower carbon emissions, but using more of a careful, consumer-focused energy policy
- NPGA agrees that expanded energy efficiency is STEP ONE toward meeting carbon reduction and climate goals.
- NPGA agrees that a dual-heat (fuel gas and electricity) pathway is essential, especially in western New York.
- NPGA disagrees with fuel gas infrastructure and gas appliance bans since they are economically inefficient, present disproportionate burdens on middle- and low-income consumers, decrease energy resilience for maintaining heating services, and present unavoidable barriers in costs as well as promulgating the inefficient use of technical and human resources.
- NPGA supports the technical development and financial investment in the use of low-carbon renewable propane, renewable natural gas, and hydrogen and hydrogen gas blends for lowering emissions in all combustion applications.
- NPGA supports the continued use of the existing natural gas delivery system and the electric grid system as part of a reliable, resilient energy system. NPGA sees that a viable natural gas industry is necessary to maintain economies of scale for fuel gas use that are needed for both propane and natural gas end use applications.[39]

[38] DeCarolis, D., New Yorkers for Affordable Energy, "How Will NY Achieve Its Climate Act Targets? A Look at the Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #9.
[39] DeCarolis, D., New Yorkers for Affordable Energy, "How Will NY Achieve Its Climate Act Targets? A Look at the Draft Plan," New Yorkers for Affordable Energy (NYAE) Webinar, February 16, 2022, Slide #12.

- Finally, NPGA supports calls for independent analysis of costs and benefits of the Plan as formulated[40] and that such independent analysis should include representation from a broader set of State stakeholder organizations. Ultimately, peer review of the independent analysis would be a prudent step in the analysis process.

In conclusion, we hope you will consider these comments as being constructive criticisms of the Draft Plan being considered by New York State. If you have any questions or comments about what is contained within this letter, please feel free to contact me.

Sincerely,

Bruce J. Swiecicki

Cc: Bill Overbaugh
Rick Cummings
Steve Kaminski
Jacob Peterson
Ted Williams

[40] Op. cit. "Green Scheme," p. 8.

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