**Draft Scoping Plan For the CLCPA**

**Climate Action Council Public Comments**

**Tuesday, April 27th, 2022**

**Buffalo Public Library**

Good afternoon. I would like the thank the Climate Action Council for this opportunity to speak on behalf of the silent majority of New Yorkers about the Draft Scoping Plan. My name is Doug Galli, I reside in Amherst, New York and I am a lifetime New York resident. I am employed by the Reid Group out of Lockport, NY.

In addition to the aforementioned silent majority, I am here to represent the industry in which I am employed, the company for whom I work and my family. I currently serve as the Chair for the New York Association of Convenience Stores, a private, not-for-profit organization representing over 1300 convenience stores throughout New York State. My employer, The Reid Group is celebrating 100 years this year and is a 4th generation, family-owned business employing around 800 associates. We are in the fuel distribution, real estate and convenience store business. We operate 82 retail locations throughout WNY and NW PA. The majority of which are in NYS. I currently serve in Government Relations, being semi-retired.

Before I go much further, and if there are thoughts that we are opposed to EV vehicles, our industry is agnostic as to what our customers wish to fuel their vehicles. We will provide whatever fuel they wish to purchase. We do have some concerns that I will state later in my comments.

First, in support of the Plan I can say that we agree on:

* Lower emissions and a careful, consumer-focused energy transition.
* To expanded energy efficiency as STEP ONE, I emphasize step one
* To a dual-heat pathway as essential in WNY climate
* To the use of low-carbon, renewable natural gas and hydrogen for lowering emissions in heating.
* To the use of existing natural gas delivery system and electric system for a reliable, resilient energy system.

We are not in support of:

* A Gas appliance ban
* Or the decommissioning of the gas system

In regards to EV vehicles we must not ignore the fact that EV vehicles are much heavier and will take a greater toll on the roads. A recent article put out by NACS (The National Association of Convenience Stores) states that the global battery cell production is less than 10% of what the EV industry will need in 10 years. EV batteries are made of cobalt, lithium and nickel. The costs of all of these minerals have skyrocketed recently. Most EV batteries are manufactured in China, a very unreliable source. A single company for cobalt produces one-third of the annual supply with 65% coming from one country, the Democratic Republic of Congo. We need to tread lightly and move slowly.

I have become an evangelist concerning this Draft Scoping plan sharing whenever and with whomever I can, because the vast majority of New Yorkers have no idea that this is coming and what it will cost them, not to mention the unreliability of what is being proposed.

China and India continue to build coal-producing facilities. They may at some time phase out of that resource, but they know in order to keep their economy growing they need to continue in the short term. New York State’s impact on the environment pales in comparison.

In reading the proposals, we are working toward more mass transit, walking and biking. This makes sense in metropolitan areas, but not in the vast majority of NY. For well over 10 years I had a 1 hour driving commute. That was where my work was and I had no desire to move my family closer. In many rural communities that is not unusual. Albany cannot and should not dictate how many miles we drive or if we want to take public transportation.

Addressing the plan to eliminate natural gas and near-full electrification of everything, there is nowhere in this plan on what the costs will be and if it is at all possible to achieve this.

Existing “electric-based clean energy technologies” cannot meet forecasted demand and maintain reliability. The sun does not always shine and the wind does not always blow at the right velocity (even in WNY). Where is the plan to increase safe and renewable nuclear energy. France gets just over 70% of their electricity generation from nuclear energy. What do they know that we don’t? I would think Germany may be rethinking their position on nuclear energy. Electrifying everything will require an electric system build out of 4 to 4.5 times the current peak usage. The State’s electric grid operator (NISO) published its concern about declining levels of reliability as early as 2023.

As a company we have two retail locations and our home office that utilize solar energy as a supplement to the existing grid. This certainly helps in times of high A/C demand when the sun is shining for longer periods. But I emphasize a supplement.

Reduced resiliency of the grid is a matter of public safety- -a renewables-based grid is not resilient. Wind and solar, because of the unpredictability of weather, are not an equal replacement for traditional energy sources.

* In 2020 there were 74 instances where there was not enough wind to power wind turbines for more than 8 hours at a time.
* In January of 2022, New York hit an all time high for wind output at 1,808 MW of power from wind turbines. 12 hours later, that output dropped to just 20 MW
* If natural gas is phased out periods of low sun and low wind leave our power grid vulnerable to blackouts
* Based on this there should not be a phase out of natural gas without a reliable technology to take its place

Ninety-four percent of energy used in the coldest WNY winter day is currently provided by natural gas. WNY is 56% colder than downstate. The burden of decarbonizing will fall hardest on upstate and WNY residents, while downstate NY produces more emissions.

How reliable will this be? Ask the people in California and Texas. Maybe when NYC experiences rolling blackouts then we will pay attention, but then it will be too late.

Here is what the potential costs could be for a home:

* A new stove/oven - $1,000
* Hot water heater - $2,700
* Electric car charger - $2,000
* Two hundred Amp electric service upgrade to your home - $2,000-$4,500
  + To add all this additional electric power to your home
* New HVAC system - $18,000-$40,000
  + Heat Pumps
    - Are expensive to install
    - Not suitable for every home
    - Heat pumps end up more expensive because electricity is more expensive than gas.
    - The yield declines when the weather is cold.

These costs and concerns are for a residential dwelling. The costs to retrofit our retail locations will be much higher. We have natural gas HVAC systems, ovens, fryers, hot water heaters.

* Electric fryers are 2 to 5 times higher than natural gas fryers
* An electric HVAC system is two times a natural gas system. Keeping in mind a new Natural gas HVAC system is $16-$20K. For around the same cost we can get a cooling system and add the heat pump, but the cost to operate these systems is astronomically higher.

All this will do is drive up the costs to consumers which will be a double hit between what it would cost them to pay for utilities at their residence and the costs to purchase anything at retail when businesses have to pay more for their utilities and pass those costs along to them.

When I share this information with friends and family, they are actually in disbelief that we would propose this at all. Before any plan is approved New Yorkers deserve to know the costs, which are estimated to be in the billions of dollars.

In conclusion, we need to seriously tap the brakes and rethink these proposals. We need to include nuclear energy and low-carbon renewable natural gas and hydrogen for lowering emissions. I’m not saying no to renewables as a supplement, but they will not be enough to keep the lights and the heat on.

My wife and I would love to live out the rest of our years in New York. We will still have 1 daughter and a grandchild here. I say still since our other 2 daughters and their families have moved or are moving out of state and not because of the weather, most of our siblings and their families are here. Our parents and grandparents are buried here. These policies will cause us to rethink that decision.

Thank you for your time.

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