From: Nancy Malec
To: erda.sm.scopingplan
Subject: Consider All Energy Choices for New York Homes and Businesses
Date: Sunday, May 8, 2022 12:50:37 PM

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Dear Draft Scoping Plan Comments Climate Action Council,

I am concerned about climate change, but extremely worried that current plans to eliminate all energy sources but electricity will prove devastating for NY families and businesses, without significantly improving our climate. There are numerous proposals in the New York Climate Action Council's draft scoping plans that concern me.

First, the Council proposes that existing homes be required to convert to electric heat pumps with electric back-up systems, despite the likelihood that this could cost upwards of $20,000 per home. Most heat pumps lose efficiency around 32 degrees, and electric back-up systems are extremely inefficient and costly to operate. Further, the draft plan ignores that the cost of electricity in New York is already expensive – with average residential rates 28 percent higher than the national average. It is hard to imagine that the prosed changes will not send electric rates even higher, which will disproportionately hurt lower- and middle-income New Yorkers.

Second, the plans call for rapid escalation of electricity demand at the very same time the electric grid would lose access to natural gas and oil, which currently produce the majority of electricity in the state, especially in winter. Power outages are commonplace in New York. In 2020, New York had the had the highest System Average Interruption Duration Index (SAIDI) score in the Census Bureau's Middle Atlantic Division, and well above the national average. The scope and speed of the shift to renewables has never been done on this scale, and threaten the security of our energy supply. With a strained grid, homes and businesses must have balanced energy choices to ensure resiliency.

The Council's proposal indicates decarbonization is only possible through electrification. This is false. Traditional fuels that are increasingly renewable – including natural gas, propane gas, and biofuel heating oil – are reducing emissions across the housing, commercial, and transportation sectors today. These draft recommendations will result in reduced business investment, fewer jobs, greater flight out of state, and higher consumer energy costs. This is especially concerning since New York is growing much slower than the nation as a whole. Finally, New York accounts for less than half a percent of global carbon emissions. Even if the plans successfully reduce New York's carbon emissions, the impact on global climate will be negligible, but the cost and disruption to New Yorkers will be great.

Thank you for the opportunity to provide comment.

Regards,
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