From: Bill Sheldon
To: erda.sm.scopingplan
Subject: Draft Scoping Plan Comments – I Have Concerns
Date: Monday, June 6, 2022 8:36:28 PM

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Thank you for the opportunity to comment on the Climate Action Council's Draft Scoping Plan. I am writing to express my concern that the final plan will recommend policies that will significantly restrict my choices and increase the costs related to my home heating and my transportation needs. An approach that sees electrification as the only way to meet the state's carbon reduction goals is too restrictive. The exclusion of all other renewable fuels would lead to greater costs, remove consumer energy choices, create security and reliability issues, and intensify the demand on the electric grid that would increase the risk of power outages. I am worried about power outages given the severity of our New York winters.

Overall, I support the goals of the Climate Leadership and Community Protection Act. But I believe that limiting our options for carbon reduction to one energy source is short sighted. It seems unreasonable not to consider renewable liquid fuels like Bioheat® Fuel and Renewable Diesel as a part of the state's solutions to meet the CLCPA's targets.

Unlike an all-electric approach, Bioheat® Fuel offers an immediate decarbonization solution for 1.4 million oil-heated homes statewide by contributing to emission reductions in the heating sector. Research shows higher blends of Bioheat® Fuel significantly reduce greenhouse gas emissions, heating costs, and fossil fuel consumption.

As of this July, all heating oil sold in New York State must contain at least 5% biodiesel, increasing to 20% (B20) in 2030. Local heating fuel providers are already delivering blends up to 50% biodiesel (B50), which can reduce carbon emissions by 40%. In 2019, the liquid heating fuels industry pledged to achieve net-zero GHG emissions by 2050, consistent with the CLCPA's goals. These higher blends may require only minor adjustments to existing heating systems, not costly replacements. Bioheat® Fuel also supports New York farms and restaurants as biodiesel comes from renewable sources like soybeans and used cooking oil.

Renewable liquid fuels such as biodiesel and renewable diesel are also being used in the transportation sector with great success. Some fleets in the state are already using blends of these biomass-based liquid fuels and their use should be encourage as part of the state's carbon free future.

Please recommend a more widespread adoption of low-carbon liquid fuels use in both the building and transportation sectors. I also ask that you reject recommendations that mandate all existing buildings be retrofitted with electric heat pumps and that new construction be all-electric. These policies limit my choices and increase what it costs for me to address basic needs like heat and transportation. Thank you for considering my concerns about the Draft Scoping Plan.

The All-Electric Building Code seeks to meet the state's carbon reduction goals of the Climate Leadership and Community Protection Act (CLCPA) by prohibiting local and municipal

governments from issuing new construction building permits unless the building is all-electric for heat, hot water and appliances, unless otherwise not feasible.

The state's climate goals include reducing statewide carbon emissions by 40% by 2030 and 85% by 2050. The CLCPA is an economy-wide climate change act covering all energy sources and for buildings sector, provides for various fuels, including biodiesel, to assist the state in meetings its climate change goals. Part EEE of TED speaks to the same goals, but limits the options for achieving them.

There are currently 6 million homes in New York that use fossil fuels for heating and hot water, and 1.4 million of those homes currently use heating oil. Heating oil has a gallon-for-gallon carbon reduction replacement fuel that burns up to 80% cleaner than petroleum diesel – that fuel is known as Bioheat®.

Studies by Brookhaven National Laboratory in Upton, NY, indicate that Bioheat® is a drop-in replacement fuel for petroleum diesel and works seamlessly in current home heating appliances at blends volumes of 50% and up to 100%.

According to NYSERDA data, there is no additional cost to the consumer as biodiesel pricing aligns with that of conventional heating oil. Additionally, starting in 2023, the home heating industry expects new heating equipment to be UL-rated to use 100% biodiesel.

New York State law currently requires 20% biodiesel blends by 2030. The home heating oil industry in New York supports the phasing out of heating oil by moving the biodiesel blend level up to 50% by 2035 and a full 100% replacement by 2050. This industry encompasses over 750 New York State businesses that employ 8,900 people – it is a $4 billion industry.

Please understand that not all combustible fuels are bad for the environment. Biodiesel combusts at an 80% cleaner emission rate than petroleum diesel and it would be 100% if not for the carbon intensity used to generate the electricity to power the plants and the fuel used in transporting the fuel. So, as the grid becomes decarbonized and fleets move to renewables, the emissions rates of biodiesel will move closer to 100% cleaner than heating oil. Biodiesel's cleaner air emissions results in associated health benefit that reduced risk of cancer and instances of Asthma. Biodiesel is also a no-to-low cost transition for the consumer.

So, for the current consumers of heating oil, a clean, sustainable, renewable, cost-effective fuel solution already exists…it's biodiesel.

As the state finalizes its budget negotiations, please include biodiesel as a common-sense fuel choice option for consumers as you consider the All-electric building code policy. Thank you.

Sincerely,
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