



CLCPA Draft Scoping Plan Public Comment

ANCA provides technical support to Clean Energy Communities and Climate Smart Communities in the North Country (NC) REDC and has since their inception. This boots-on-the-ground model is imperative to meet CLCPA and Draft Scoping Plan goals. The iterative co-design model used to structure the CECF and Regional Clean Energy Hubs Program ensures these programs continue to be impactful and responsive. If the proposed coordinator's role expands to include sector-specific support on advanced topics and to provide a greater level of technical support to underserved communities, the organizations implementing these services need robust training and proportionate compensation.

ANCA supports Tier 2 hydroelectric generators. Recent policy changes have made it so NC hydro assets struggle to maintain operation. These generators provide local renewable energy critical to the State's 70 by 30 target while propelling the economy. In a region where Tier 1 solar and wind development, is contentious, legacy hydro is a trusted asset in need of financial support.

The NC, particularly LMI residents, rely on biomass for home heating. Though biomass is not carbon neutral, it is a necessary tool to bridge high heating loads in the NC. The forested lands of the Adirondack Park play a significant carbon sequestration role and long-term storage of carbon in harvested wood products. Biomass provides NC residents with an affordable fuel source with little price volatility and biomass heating plays an important role in private land forest management, particularly by creating markets for low-grade timber. Convincing this population to electrify their heating and cooling systems may only be viable if complemented by biomass.

To enable this transition, NYS should offer existing bulk fuel/fossil fuel HVAC technicians attractive incentives to transform their businesses to renewable technologies. In the NC, these are trusted businesses with lasting relationships in the community and can move the dial in convincing stakeholders to electrify.

To expedite EV transportation, there must be increased incentives for LMI populations to purchase EVs and to install EV infrastructure. A strategic EVSE network is imperative to maintain the tourism industry in the North Country. A revenue recovery mechanism must also be created to offset lost revenue from gas sales tax, a critical funding source for NC counties.

Municipal electric utilities that are draft DACs must be eligible for SBC funded programs.

Affordability and accessibility must be addressed to increase adoption. This means higher incentives that are not onerous for contractors and customers to apply for, coupled with increased technical support. We also recommend diversifying eligible technologies to include small wind, agricultural RNG, and material recycling.

Home and business owners should be eligible for incentives for DIY weatherization and energy efficiency upgrades. Cost savings will be motivational, replicable, and paramount in convincing stakeholders to adopt CLCPA and Draft Scoping Plan.