Date: July 15, 2022

Dear Climate Council Members:

I represent HUNT Property Solutions, a wholly owned subsidiary of HUNT Commercial, the largest commercial real estate brokerage in Western New York. I am the Senior Vice president of HUNT Property Solution (“HPS”). HPS manages approximately 500,000 square feet of commercial properties.

I’ve been in property management for 40 plus years. In that time, I’ve implemented energy conservation measures that have saved owners millions of dollars. Energy saving technology keeps improving and Btu/sq. ft. numbers keep dropping. Current technologies such as LED lighting, DDC Controls and Variable Frequency Drives were unimaginable 30 years ago but they’re commonplace now. Natural gas fired boiler and hot water heaters replaced coal-fired and oil-fired equipment. Efficiencies have jumped by 20% and the level of pollution produced by this equipment is negligible by comparison. Significant progress has been and will continue to be made that will organically and economically contribute to greenhouse gas reductions.

Based on my experience, I respectfully ask you to consider the points below relative to the proposed measures in the CLCPA.

1. Effect on Disadvantaged Communities – The current guidelines stipulate that no natural gas appliances or HVAC units can be purchased 2 years from now. The cost of electricity is far higher than natural gas on a BTU-to-BTU basis and regardless of efficiency of performance with an electric alternative, energy bills will dramatically increase. Many of these families are just scraping by now. This additional cost will likely be a minimum of $100 more each month. How will these households afford this? Offsetting these increases via subsidized programs merely pass along costs to others clouding market price signals for all.
2. Competitive Disadvantage – Legislation like the CLCPA is being considered by numerous states. However, only certain states are likely to move as aggressively as New York State has. Implementing the legislation as described within the Draft Scoping Plan, with the current restrictions, will significantly increase energy prices as well as the cost of doing business in our state. This will put New York State at a serous disadvantage as we compete nationally and internationally for businesses to set up here.
3. Ignorance of Energy Saving Measures – Simply migrating from natural gas to electricity is not necessarily any better for our climate. Reducing energy usage will preserve resources and cut costs for consumers and businesses. There are numerous incentive programs such as C-PACE financing for energy projects along with utility and NYSERDA programs that have been very successful in reducing energy usage. Any legislation should focus on increasing efficiencies rather than eliminating sources of energy. Doing so will reduce our carbon footprint, lower the cost of doing business and make our state more attractive. Energy innovation should not be underestimated. Advances in technology reduce energy usage and the cost of doing business; producing a win win result for New York State.
4. Electrical Generation and Distribution – The CLCPA is focused on shifting from the use of coal, natural gas and nuclear for power generation and end use to renewables. Significant loads due to electrifying our whole economy will stress already constrained transmission and distribution systems without the benefit of dispatchable generation to avoid brown outs or black outs placing our local economy at risk.

This situation will become far worse as more homes and businesses come online with all electric appliances and HVAC systems. Electric vehicles are becoming more numerous as well. We don’t have enough capacity on our electric system now to support air-conditioned homes in a hot spell. What will happen when residents are charging 5,000 lb. vehicles overnight and using electrified HVAC systems and appliances during peak periods?

It is important to focus on clean sources of power. However, the measures outlined in the CLCPA, have already resulted in disconnects between the location of renewable energy sources and where the electricity is needed. Commercial, industrial, and residential users will be relying on intermittent supply and long duration storage that will never provide the same resiliency we currently rely on. If this is the direction we take, transmission and distribution need major improvements to handle the significant increase in load which will add additional cost over many years to come.

1. More Research Is Needed – Before we fully embrace the CLCPA, more research should be done to understand the causes of climate change and what can be done to protect the inhabitants of planet earth against catastrophic climate events. Our climate has changed since the beginning of time (prehistoric ice age, Greenland is no longer green.) Over the last 15 or 20 years, we’ve theorized that this is from the action of humans. Some climate scientists have theorized that human actions are responsible for less than 5% of climate change.

75% of the earth’s surface is covered by water. Do we know the overall effect of this mass of water on climate? Weather forecasters regularly blame unseasonal weather on conditions in the Pacific Ocean. How does sunspot activity influence our climate? If it’s determined that humans are, in fact, responsible for a significant amount of climate change, what other means are available to address this? Lots of research is being done on the possibility of using hydrogen, renewable natural gas and other non-fossil sources as fuels which would allow us to maintain a gas distribution system bought and paid for by ratepayers. What if we reestablished the manufacturing base in the United States and ended the massive parade of ships that carry goods here from China and the enormous carbon footprint associated with that? It’s quite possible a change like this could accomplish the goals of the CLCPA while replacing a multitude of jobs that were shipped overseas. It is understood that the Scoping Document is a function of a legislative process, but the Climate Action Council, that includes all State Agencies, has a responsibility to its constituents to recommend changes to the law where that law may unintentionally harm its citizens.

Sincerely,

Stephen P. Fitzmaurice