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June 30, 2022

Doreen Harris
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, NY 12203-6399

Re: Draft Scoping Plan Comments

Dear Ms. Harris,

NOCO is a third generation family owned business based in Tonawanda, New York since 1933. We are proud Americans and proud Western New Yorkers. Our business is increasingly diversified, but the majority of our sales are still derived from conventional fossil fuels at this time. Western New York is not immune to the impacts of climate change and we understand the need to transition to new energy sources.

From our beginning, our goal has been to serve the needs of the community. For decades, our customers have invested heavily in heating and transportation equipment that uses diesel fuel, propane, natural gas and other conventional fuels because no alternative technologies have existed. Today, our customers rely on these fuels for essential functions that include transportation of food and other commercial goods as well as home heating in the winter months. We won't leave those customers behind and intend to continue serving them.

At the same time, NOCO is embracing change the same way it has throughout its history.

We are working with our customers to facilitate an orderly transition to new energy sources and lower carbon operating practices through the most economic means possible. We have been growing our business by investing in new, greener technologies and developing a line of sustainable services such as energy efficiency, renewable power, geothermal heating and cooling, industrial fluids recycling and organics recycling.

As a new economy emerges we are committed to providing reliable, good paying jobs within our communities. We are hiring local tradespeople and university graduates to maintain our current business lines and to develop the businesses of the future. As the energy transition proceeds, we will be investing in re-educating our staff and re-deploying our workforce.

One common criticism that we hear about the Climate Act is that the investments and infrastructure required for New York's electric grid will be excessive. Grid safety, reliability, and security are top concerns for us, our customers and community and must be balanced against the costs and urgency developed by climate change.



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We share these concerns, but where others see challenges and obstacles, we see opportunities. NOCO will be working with customers on behind the grid projects to electrify, improve efficiency, decentralize energy generation and will provide reliable and renewable electricity to our communities. We encourage the state to promote the expansion of these types of projects, and to enact policy to help fossil fuel companies support and survive the transition.

After ninety years of serving our community, we view ourselves as stakeholders in this process. As we embrace the energy transition of our lifetimes, we are committed to investing in the future for our community, our customers, and our employees. We want to have a greater voice in how the carbon transition unfolds in New York, and stand ready to support our customers and communities. We urge you to keep people in mind and help all make the transition, including those reliant on the fossil fuel industry for their livelihoods.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James Newman', written over the typed name and title.

James Newman
Chief Executive Officer
NOCO LLC