

Draft Scoping Plan Comments
NYSERDA
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Re: Comments on Climate Action Council Draft Scoping Plan

Dear Climate Action Council and NYSERDA,

The New York Independent Service Operator (NYISO) has provided much information about grid reliability as we transition to a carbon-free grid.ⁱ NYISO has also reported the difficulty of adding “limited output from variable resources” to the gridⁱⁱ, explaining the need for dispatchable energy and what the dispatchable energy resource might be to meet the Climate Leadership and Community Protection Act (CLCPA) mandate for 2050.

Proponents of renewable energy often do not acknowledge this need for dispatchable energy. In my mind, you cannot have one without the other. As New York races aboutⁱⁱⁱ, paving over forest and agricultural lands with solar panels, there is no requirement to state what the dispatchable energy will be or where it is coming from.^{iv}

The Scoping Plan should provide that with each solar or wind project to be installed, dispatchable energy resources be stated in the project plan. Like when a gas transmission pipeline project is reviewed, there must be shown how much gas, the need for that gas, and what company is buying it.

NYISO states that the dispatchable energy resource must be gas.^v So as NYS installs huge solar farms, (again, destroying agricultural lands, because those lands, in haste, would be the most desirable)^{vi}, the need for dispatchable gas fired energy increases.

There is no good that comes from doing anything in haste- that “look before you leap” adage comes to mind. We should never overlook careful environmental review in the name of getting a project permitted. Emissions from gas fired electric generation must be accounted for and weighed against the so called benefit of installing huge solar farms.

Both NYISO^{vii} and NYSERDA estimate we will need as much (25GW) or more than our current fossil fuel power plant capacity for dispatchable backup. Although sunset for upstate nuclear reactors seems to be part of the plan, there is no indication if or when any gas plants will close. In fact, demand for fast-ramping dispatchable power might mean that we will need more peaker plants in the future.

NYSERDA and NYISO plans propose that NY will build storage capacity 100x bigger than the world's current largest li-ion facility, the 1.25GWh Moss Landing plant. Yet, NYISO admits this storage will be quickly depleted.^{viii}

Are we sure that solar panels and wind turbines are the best way, the most efficient way, to proceed with mitigating climate change? The experiences that California and Germany have shown us, I would

say not. Even NYS has increased its carbon emissions while closing Indian Point reactors, 2 and 3. NYS must not ignore the benefits and climate change mitigation that carbon emission free nuclear energy can provide. Please do not close our existing nuclear power plants. Please pursue more nuclear power electric generation in NYS. Nuclear power is no stranger to NYS. In this draft scoping plan, nuclear power has not gotten the attention it deserves.^{ix}

Thank you for this opportunity to comment on the Draft Scoping Plan.

Respectfully,

Jan Mulroy

End Notes

ⁱ <https://www.nyiso.com/documents/20142/2223020/2022-Power-Trends-Report.pdf/d1f9eca5-b278-c445-2f3f-edd959611903?t=1654689893527> Until there are enough clean energy resources on the grid to replace the reliability services provided by fossil fueled generation, natural gas must continue to play an important role in meeting energy needs in New York to maintain system reliability which supports the health, safety, and welfare of New Yorkers. Pg.27

ⁱⁱ

<https://www.nyiso.com/documents/20142/15125528/02%20Climate%20Change%20Impact%20and%20Resilience%20Study%20Phase%202.pdf/89647ae3-6005-70f5-03c0-d4ed33623ce4>

Phase II Study notes:

Dispatchable and emissions-free resource

Even with the substantial infrastructure and resource growth in steps 1-7, there will likely need to be a dispatchable resource with attributes needed to help balance the system under certain conditions, such as high loads, loss of resources, inter-zonal transfer limits, **and limited output from variable resources**. This report focuses on the attributes needed from such resources, without assuming we can anticipate what form they will take in 2040 as technologies continue to evolve. Pg. 22

ⁱⁱⁱ <https://climate.ny.gov/-/media/Project/Climate/Files/Draft-Scoping-Plan.pdf>

Draft Scoping Plan

Legislation

Chapter 58 of the Laws of 2020 established the Accelerated Renewable Energy Growth and Community Benefit Act as part the State Fiscal Year 2020-2021 budget to dramatically speed up the siting and construction of clean energy projects to combat climate change and help jump-start the State's economic recovery from the COVID-19 health crisis. This law created a first in the nation Office of Renewable Energy Siting (ORES) to improve and streamline the process for environmentally responsible and cost effective siting of large-scale renewable energy projects across New York, while delivering significant benefits to local communities. This law, which is being implemented by the New York State Department of State (DOS), NYSERDA, New York State Department of Public Service (DPS), DEC, the New York Power Authority (NYPA), and Empire State Development (ESD), will accelerate progress toward New York's nation-leading clean energy and climate mitigation requirements, including the mandate to obtain 70% of the State's electricity from renewable sources, as identified under the Climate Act.

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^{iv} <https://www.nyiso.com/documents/20142/23494579/Power-Trends-2022-Datasheet.pdf/00bff147-bb47-ada2-9199-80182013be91>

NYISO Power Trends 2022 Report

Shrinking Reliability Margins

New York has historically seen strong levels of resources on the grid to meet peak loads, which support the reliability and resilience of the system. Those reliability margins are narrowing as fossil-fueled resources are retiring at a faster pace than clean energy resources are entering the electric system. While the bulk electric system meets current reliability requirements, the margins of needed resources are tightening. For instance, while the closure of the Indian Point Energy Center did not create an immediate reliability need, it is part of a broader loss of capacity that is thinning reliability margins.

v <https://www.nyiso.com/documents/20142/2223020/2022-Power-Trends-Report.pdf/d1f9eca5-b278-c445-2f3f-edd959611903?t=1654689893527>

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vi <https://nysba.org/preempting-local-zoning-codes-fuels-opposition-to-renewable-energy-in-new-york/>

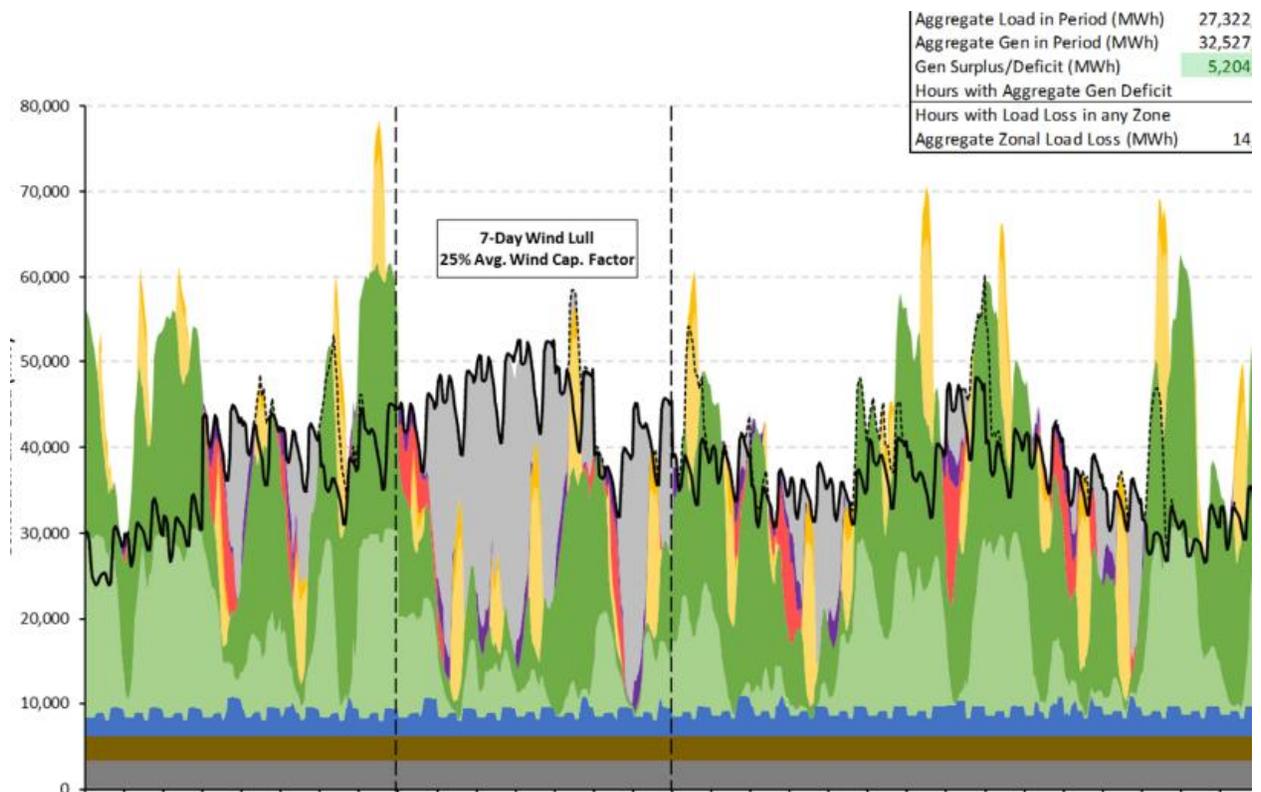
Preempting Local Zoning Codes Fuels Opposition to Renewable Energy in New York

By Frederic M. Mauhs

vii <https://www.nyiso.com/documents/20142/10773574/NYISO-Climate-Impact-Study-Phase-2-Report.pdf/>

NYISO Phase II Climate Impact Study

viii



<https://www.forbes.com/sites/michaelshellenberger/2019/03/28/the-dirty-secret-of-renewables-advocates-is-that-they-protect-fossil-fuel-interests-not-the-climate>

Why Renewables Advocates Protect Fossil Fuel Interests, Not The Climate

"EDF, NRDC, and Sierra Club know perfectly well that solar and wind require the expansion of fossil fuels. How could they not? They've been killing nuclear plants and watching air pollution rise, as a result, for a half-century."