



July 1, 2022

Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203

American Biogas Council Comments Re: New York State Climate Action Council Draft Scoping Plan

Thank you very much for the opportunity to submit comments regarding the New York State Climate Action Council's Draft Scoping Plan. The American Biogas Council (ABC) is the unified voice of the United States biogas industry: we represent more than 320 organizations nationwide and thousands of professionals throughout the biogas supply chain who are dedicated to recycling organic waste into biogas and soil products. Twenty of our Member organizations are based in New York.

We applaud New York's leadership on climate change and are pleased the development of the Scoping Plan has been such a thorough process. We view biogas as a vital part of meeting our current and future climate-based challenges and priorities. At their core, biogas systems (anaerobic digesters) protect our air, water, and soil by recycling organic waste – food scraps, green waste, manures, wastewater biosolids – into renewable energy and soil products, while reducing emissions of the potent greenhouse gas (GHG) methane, which makes up 35% of New York's total emissions. Biogas systems have lower Carbon Intensity (CI) scores than grid energy, are part of the solution to the challenges the Climate Action Council seeks to address, and are accepted as such across the United States and around the world.

After careful consideration of the Scenarios proposed in the Draft Scoping Plan, the ABC strongly supports Scenario 2: Strategic Use of Low-Carbon Fuels. Scenario 2 importantly includes the use of bioenergy derived from biogenic waste, agriculture & forest residues, and limited purpose grown biomass for "difficult to electrify" applications. It is the only Scenario that takes into account the critical role biogas systems play in promoting a clean climate by converting various forms of waste into renewable energy through anaerobic digestion, and returning valuable nutrients to the soil as digestate.

Conversely, by focusing almost exclusively on accelerated electrification, Scenarios 3 and 4 allow an at-best-limited role for low carbon fuels, such as biogas. While the ABC strongly supports initiatives to move New York away from a reliance on GHG-emitting fossil fuels, an emphasis on accelerated electrification at the expense of other technologies drastically undervalues the environmental and economic benefits that biogas operations bring on farms, at waste facilities, at wastewater treatment plants, and for food waste. Scenarios that limit biogas hinder the abatement of methane emissions, which are 85 times more powerful as a near-term GHG than carbon dioxide. Additionally, biogas can be part of an electrification solution, but limitations or prohibitions on combustion that are part of Scenarios 3 and 4 would have a negative impact on the production of biogas electricity.

We believe that [biogas has tremendous potential to contribute to a cleaner climate in New York](#). Our estimations are that a fully realized biogas market in New York would bring millions of kWh electricity or gasoline-gallon-equivalents of fuel, more than \$1.5 B in capital investments, over 1,000 jobs, and reduce GHG emissions equivalent to taking more than 5 million cars off of New York roads. When New York incorporates low carbon fuels like biogas into its energy portfolio, the path away from fossil fuels and toward the Climate Action Council's goals for the climate future becomes more attainable.

Thank you for the opportunity to comment, and for the excellent work that the CAC is doing in leading the way to a more responsible and efficient energy and climate future in New York and nationwide. We strongly support Scenario 2 in the Draft Scoping Plan and look forward to working with NYSERDA and the NY DEC in any way we can to help address the important environmental, economic, and social issues presented by climate change.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Serfass". The signature is fluid and cursive, with the first name "Patrick" and last name "Serfass" clearly distinguishable.

Patrick Serfass
Executive Director
American Biogas Council
staff@americanbiogascouncil.org