RAYMOND CASIMANO NEW YORK PROPANE GAS ASSOCIATION

CLCPA – Problems Ahead for New York Families

Comment [JP1]: Do we use this or CAC's plan ...?

Climate change is a threat, and it's everyone's responsibility to do what they can to mitigate and address its effects. It is important to ground our efforts in solutions that are real and attainable. The propane industry is investing in solutions that can make a difference, such as renewable propane.

The success of the draft scoping plan relies heavily on inflated benefits and underestimated costs. For instance:

- The plan banks on dramatic changes in human behavior, attributing \$39.5 billion in health care savings to people walking and biking more.
- It assumes \$235 billion in savings by avoiding climate change impacts—but this ignores the fact that carbon emissions are a global problem.
- New York State produces less than a half a percent of carbon emissions.
 Meaningful change can only be achieved with a global response.

However, the most significant oversight of the Climate Action Council's plan is that **it fails to seriously address grid reliability issues**. Our electric grid is aging and is already subjected to frequent outages.

A push to "electrify everything" without first making major investments to upgrade and prepare the grid for higher loads isn't just short-sighted—it's dangerous. You can't squeeze the flow of the Hudson River into a 4" pipe, and you can't "electrify everything" on our current grid.

 Grid reliability is a matter of public safety. Whether it's scorching temperatures during summer or freezing conditions in winter, outages can be life-threatening.

Higher costs, fewer choices, and less reliability. This is the future that New Yorkers face if the plan is followed as submitted.

Propane is flexible and dependable with a low carbon footprint, and is an EPAdesignated certified clean fuel with low carbon content. It can, and should, be part of the state's long-term sustainability plans. Comment [JP2]: I think a concrete number here would be good, but I didn't want to hold this document up looking for it, I will try and track this down. I think NYISO might have outage info.

THE PLAN SHOULD INCLUDE CHOICES, ELECTRIC EVERYTHING DOES NOT WORK FOR EVERYONE!!