ELECTRICITY

Thank you for the opportunity to comment on New York's draft scoping plan to achieve the goals of the Climate Leadership and Community Protection Act. I am grateful to the work of the Climate Action Council on creating this document, which includes many strong steps towards addressing climate change and places New York as a leader on climate. To address the electricity sector, which accounts for 13% of New York's greenhouse gas emissions, New York must rapidly end all fossil fuel development while investing in storage and renewable energy resources and prioritizing a clean energy transition for Disadvantaged Communities that have borne the brunt of fossil fuel pollution and economic hardship. The final scoping plan must:

- Close fossil fuel plants in Disadvantaged Communities and financially support a just transition. The phase-out of fossil fuel plants in disadvantaged areas must consider the potential financial impacts on the local economy. Financial support must be provided to communities to ensure that reducing fossil fuel usage does not lead to significant unemployment or financial burdens.
- Require fossil fuel companies to bear full responsibility for cleanup of polluted sites. Fossil fuel companies must bear responsibility for remediating any damage caused to the local environment, as they are the actors who necessitated clean up. The burden for site remediation should not fall on public funds and/or entities.
- **Replace fossil fuel plants with storage infrastructure.** Bolstering storage infrastructure is essential to transitioning away from fossil fuels and enhancing the energy grid. With the consent of the local community, storage sites should be established at former fossil fuel plant sites.
- Ban construction of fossil fuel facilities: NO NEW FOSSIL FUELS. To achieve the goal of retiring fossil fuel facilities and reducing fossil fuel dependency, it is of paramount importance that no new fossil fuel infrastructure is constructed. Funds should go towards expanding renewable capacity, assisting disadvantaged communities, and investing in energy storage.
- Set clear and rapid targets for ending fossil fuel generation. Tangible, specific, and clearly articulated targets for ending fossil fuel generation must be established and evaluated to ensure adherence to climate goals.
- Establish incentives for small-scale distributed solar and storage. Incentives for solar and storage on a rooftop scale are essential, since introducing smaller scale solar and storage will effectively integrate more renewable resources into communities and reduce reliance on polluting power plants.