The NYS CAC Draft Scoping Plan "Electricity Chapter" (chap 13) may contain a lot of useful information, but as it stands, it is an atrocious piece of work. Instead of providing clarity, it is deliberately confusing. However, if pathetic deployment rates of renewable electricity occur, no amount of "Justice Talk" can make up for the Injustice of inadequate renewables deployment resulting in inadequate job creation, little if any supply chain new manufacturing and reliance on expensive (solar PV) electricity. So much for the nice wishes in its "Climate Justice" sections

What is needed is a table that lists the year and the amount of delivered renewable electricity/ capacity to make electricity (by type of renewable generation) expected to be made in NY. But instead, a confusing array of various goals based on capacity to make electricity instead of what is delivered (= capacity multiplied by average efficiency). And while mention is made of stored electricity (batteries and/or pumped hydro), no funding for it is proposed, nor is who will "eat" the extra costs added to delivered electricity prices that is embedded in energy storage. Nor is there any discussion on the bizarre and harmful pricing system for electricity in NY State that disadvantages wind and solar electricity compared to fuel based electricity generation, and how to overcome variable (and unknowable future) electricity pricing.

Proposed summary table:

Year

Renewable Electricity deployed in year (GWd) Onshore wind, Offshore wind, PV (Capacity/Delivered) NY State Renewables content (%)

GWd is defined as GW-hr/yr divided by the number of hours per year (8760, 8784, ave = 8766)

The plan mentions 9 GW of offshore capacity (4.5 GWd) and 6GW of PV capacity (=  $\sim$  1 GWd) by 2030. To achieve its goal of 70% by 2030, an additional 11.2 GW d needs to be operational presumably this would be accomplished with onshore wind turbines, which are THE lowest real cost of generation technology. The plan says little about NY's 4 remaining ancient nukes (as of 2022) which will hopefully be closed down (requiring an additional 3 GWd of clean electricity). This would still leave 9.3 GWd of pollution sourced electricity (probably fossil methane sourced, assuming it can be found by then) to "round out" NY's generation requirements.

The confusion in this document was deliberate - a way to hide the failure to figure out how to deploy 13.2 GW d (= 33 GW capacity at 40% efficiency) of onshore wind turbines. Odds are, this "fog-out" will work, but NY will never hit its goals by passing off propaganda as something worthwhile