

**Marcus J. Molinaro**  
County Executive



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Deputy County Executive

## COUNTY OF DUTCHESS

June 30, 2022

### VIA EMAIL

Ms. Doreen Harris  
President and CEO  
New York State Energy Research  
and Development Authority  
17 Columbia Circle  
Albany, NY 12203-6399

Mr. Basil Seggos  
Commissioner  
New York State Department of  
Environmental Conservation  
625 Broadway  
Albany, NY 12233-1011

### **RE: Dutchess County, NY Comments on the Draft Scoping Plan as Required Under the Climate Leadership and Community Protection Act**

Dear Co-Chairs Harris and Seggos:

Dutchess County has completed a thorough evaluation and analysis of the Draft Scoping Plan (DSP) to implement the Climate Leadership and Community Protection Act (CLCPA) as requested by the Climate Action Council. Our analysis provides a pragmatic look at the State's energy future if this plan is adopted. The detail of the analysis is meant to be as comprehensive as the DSP with examples, analogies and perspectives explaining why this draft plan is a blueprint for failure.

The CLCPA proposes to undertake a sweeping set of measures with the intent to eliminate the State's carbon footprint, transform electricity generation in the State, and drive innovative solutions through technology advancement in pursuit of New York State's Climate Vision. We do not believe the plan, as it has been proposed, will be a successful effort and more importantly, in the process, New York will experience economic hardship as individuals and businesses leave the State for more reasonable, affordable and desirable locations.

Key themes presented throughout the County's analysis include:

- The mandates, set to begin in just a few years and continuing to roll out over 30 years, cannot be considered reasonable without accepting the extreme societal risk of eliminating the existing reliable energy infrastructure and replacing it with intermittent renewables. Proposed wind and solar can in no way replace the current, highly reliable and sustainable natural gas infrastructure. However, the actions taken to suspend critical natural gas service to millions of homes and businesses will create a void that holds an existential risk to the life and livelihoods of New Yorkers.

- Natural gas is a clean fuel, with well-established benefits, which New York State promoted for many years. The experiences in Texas and California proved there is a need for diverse, reliable and available energy sources. Natural gas is needed, and without it, New Yorkers will suffer with inevitable brownouts and blackouts in the depths of winter and the peak heat waves of summer. Rolling brownouts or multi-day blackouts are unacceptable and could have catastrophic outcomes with lives impacted and maybe lost. How do elderly residents deal with extreme heat in a NYC high rise building during rolling brownouts? Will they be expected to navigate multiple flights of stairs to get to a community cooling center? Who will take responsibility for those freezing to death in the Adirondacks during winter blackouts?
- Given the recent turnaround in the nation's acceptance and support for nuclear power (arguably the cleanest and most potent renewable energy), and as seen in California's decision not to close Diablo Canyon, this nuclear source for electric supply should also be included as a viable alternative in the plan.
- Dutchess County supports the use of solar and wind power. However, it is inconceivable that solar and wind can produce enough reliable energy to replace the current, reliable gas network, particularly within the unrealistic timelines established in this Act. Hydrogen may hold the potential to be a suitable natural gas substitute but moving to retire and eliminate the State's natural gas infrastructure, while the replacement timing is clearly unknown, is irresponsible and ill-conceived.
- The actual total costs for the State's proposed energy systems of the future are unknown but will be borne by the residents of this state. This plan boasts an estimated toll of at least \$150,000 per New Yorker over the next 30 years in new state costs. Actual costs will likely be much higher, promoting rampant inflation, decreased standards of living, and will require substantially higher taxes, all while decimating energy reliability. These new State costs also do not include the additional personal costs residents will face with increased utility costs, home renovations, vehicle costs, and more.
- CO2 emissions are a worldwide phenomenon and for all the sacrifice and cost associated with New York's scoping plan, the expected impact on CO2 emissions is miniscule. While New York is looking to be an example for other states, it is unlikely that other states will respond in kind. Globally, as business and industry leave New York, manufacturing in countries such as China, India, and Russia will still use coal-based, CO2-intensive energy generation. We will sacrifice significant economic advancement and cause irreparable harm to those residents who cannot afford to move elsewhere, while other countries damage the environment and climate and gain competitive advantage in the marketplace. The CLCPA touts New York State's "leadership," however the enormous cost and quality of life impacts to New Yorkers should be a greater concern than State hubris.
- The scoping document calls for the eventual conversion of all vehicles from combustion engines to electric motors (including all cars and trucks, personal and commercial). Even if such a massive transition could occur, the enormous electric demand for daily charging would further tax the proposed intermittent wind and solar energy systems. The belief that public transportation will be available, and an acceptable alternative is highly suspect and will further cripple both the State's economy and residents' lifestyles. A modified plan is imperative.

Like the flow of blood in the human body coming from a dependable and reliable heart, society now depends upon the reliable availability of multiple energy sources to sustain itself. Those energy sources must be proven and consistent. Would you think it is a good idea to replace your heart with an untested pump? Is it a good idea to replace society's current energy systems with untested intermittent sources of supply?

Most residents have no idea of the sweeping changes that are being thrust upon them over the coming years or how much it will cost them both financially and otherwise. The plan's timeframes allow no opportunity to test new, proposed energy systems and offers no assurance of energy reliability. Until a detailed, logical, well informed, achievable plan can be laid out for the citizens of New York, the drastic mandate setting should be suspended. Continuing to build a renewable energy infrastructure is a worthy goal, but we cannot carelessly cast aside available, dependable and affordable fossil fuel energy until the State knows, with certainty, how the transition will occur and the subsequent impacts have been clearly outlined and accepted by New Yorkers.

Thank you for your careful review and consideration of our analysis and evaluation of the DSP.

Respectfully Submitted,



William F.X. O'Neil  
Deputy County Executive  
Dutchess County Government

cc: Climate Action Council Members (w/enc.)