

I thank and commend the Council for its vision and hard work in putting the scoping plan together. It's a remarkable plan and the Council deserves hearty kudos. Like any draft plan, it's natural that some elements may need to be revisited, especially as new information becomes available or new developments occur.

I am writing to express my concern that given the current and past rate of development of renewable energy (RE) for electricity generation in New York, it is very likely that in the absence of additional planning and course correction, the State will miss its renewable generation targets for 2030 (70%) and beyond by a wide margin. The Council may have underestimated the headwinds that RE generation is likely to face, and some of the same factors that have resulted in slow development in the past will continue to slow down progress in the future. The latest example of this is the Glenmont lawsuit against the Port of Albany¹.

I strongly urge the Council to double down on the following alternatives in the Final Scoping Plan to ensure that the State's emissions reduction targets for the Electricity sector stay achievable. This is particularly important because even though electricity accounts for just 13% of the state's current emissions, the leading sectors of Buildings and Transportation rely on electrification for decarbonization. Therefore, a failure to achieve the Electricity sector's targets will have a devastating impact on the State's ability to meet the CLCPA's economy-wide decarbonization goals.

I urge the council to seriously consider the following recommendations:

1. Distributed Generation and Storage, and Energy Efficiency

The State must set ambitious targets for deploying Distributed Energy Resources (DERs) including solar, battery storage, and demand response. The State must also provide necessary incentives as well as directives through legislative and regulatory means to ensure that the targets are met. Please refer to the report² by VCE with the modeling of two scenarios of DER deployment (with and without distribution co-optimization) and a cost-benefit analysis of both for their role in New York's electricity decarbonization.

2. Nuclear Power

While wind and solar energy have a critical role to play in decarbonizing electricity generation, beyond a certain ratio of variable to total generation resources, firm resources³ become increasingly valuable and indispensable even if, on paper, their levelized cost is higher than those of variable resources. Deploying new nuclear generation in New York may be

¹ [Glenmont residents sue Port of Albany, Bethlehem over wind turbine project;](https://www.timesunion.com/business/article/Glenmont-residents-sue-Port-of-Albany-Bethlehem-17268503.php)
<https://www.timesunion.com/business/article/Glenmont-residents-sue-Port-of-Albany-Bethlehem-17268503.php>

² [Decarbonizing New York Through Optimizing Distributed Resources;](https://www.vibrantcleanenergy.com/wp-content/uploads/2021/10/VCE-VS-NY_Final.pdf)
https://www.vibrantcleanenergy.com/wp-content/uploads/2021/10/VCE-VS-NY_Final.pdf

³ [Decarbonizing Electricity: The Critical Role of Firm Low-Carbon Resources;](https://www.cesa.org/wp-content/uploads/2021/10/100-Collab-webinar-slides-5-15-20.pdf)
<https://www.cesa.org/wp-content/uploads/2021/10/100-Collab-webinar-slides-5-15-20.pdf>

untenable in the face of opposition from activists; however, the State must ensure that the Ginna, Fitzpatrick, and the Nine Mile Point Nuclear Power Plants with a total nameplate capacity of 3.2 GW of low-carbon generation stay open and operational in the coming decades until New York has sufficient carbon-free resources in place to ensure that fossil gas combustion will not replace the lost nuclear generation.

3. District Thermal Networks

The State must double down on deploying pilots and subsequent utility-scale thermal networks. A typical homeowner connected to such a network for heating and cooling would experience an upfront cost similar to that of an Air Source Heat Pump (ASHP), but would enjoy heating/cooling efficiencies of a Ground Source Heat Pump (GSHP), or even better. The value of this tool in helping New York meet its emissions targets is underappreciated in the current scoping plan. Thermal networks have the potential to substantially reduce New York's future electricity demand while rapidly decarbonizing the building sector. Every building that utilizes a thermal network in lieu of ASHP-based heating/cooling locks in low electricity consumption for decades, and vice versa.

Conclusion

Keeping New York's nuclear plants open and rapidly scaling thermal networks as we transition off gas also have serious Just Transition implications. The nuclear plants employ well-paid union labor, and the thermal networks would offer similar opportunities to workers displaced by gas transition. As a result, not only are these two measures important for the stability and growth of our workforce, they could also help soften the opposition to building electrification from certain unions like the IBEW.

Thank you again for your time and efforts.