

# Revere Copper Products, Inc.



June 30, 2022

Ms. Doreen M. 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: Comments on CLCPA Draft Scoping Plan

Dear Co-Chairs Harris and Seggos:

Revere Copper Products, Inc. is a manufacturer of copper products used in electrical distribution, electric vehicles (EVs), EV charging stations, architectural, HVAC systems, and many other markets. Our only location is in Rome, New York and employs over 330 people and is an important contributor to the State's economy. As a large end-use consumer of electricity and natural gas in New York, Revere is subject to state decarbonization policies, and pays substantial energy-related costs. Therefore, the outcome of the Climate Action Council's actions is very likely to significantly impact the future of our operations in New York State. For the reasons set forth below, Revere requests that the Council revise the Draft Scoping Plan and adopt a Final Scoping Plan that achieves the CLCPA goals in a manner that maintains jobs and economic growth opportunities in New York, and protects a key manufacturer to the success of the "green economy".

Revere strongly supports the **Comments on the Draft Scoping Plan submitted by Multiple Intervenors (MI)** to you on June 22, 2022. We would like to demonstrate how several Points that MI makes specifically impact Revere.

Revere is not only supportive of the goals CLCPA, but products that we produce will be a necessary component of the infrastructure needed to accomplish those goals

therefore making Revere part of the solution. Revere produces many fundamental products needed for the electrification of New York State. Our copper products are key components in transformers, power distribution systems, EVs, and EV charging stations. Having said that, it would be extremely unfortunate if a company like Revere could not compete and do business in New York State due to the overall cost and reliability of energy supplies as a result of how CLCPA is implemented.

With respect **Points I through III** in Comments by MI related to cost impacts. Revere is a large end-use consumer of electricity and natural gas. Energy is a large component of our overall cost to produce our products. Even small changes in energy costs compared to our out-of-state or foreign competitors could make our products uncompetitive.

**Point IV** by MI relates to Energy Intensive and Trade Exposed (“EITE”) industries and “leakage”. If companies like Revere cannot compete in New York State, their products will end up being produced outside the state. Most likely this will happen in a state or foreign country that has worse clean energy standards than New York currently does. What a disappointment the CLCPA would be if the end result reduces well-paying manufacturing jobs, while at the same time actually drives global carbon emissions up!

**Point V** in the Comments by MI relate to the lack of a comprehensive strategy for reducing statewide reliance on natural gas and protecting gas customers. At Revere, natural gas heated furnaces are an integral part of the manufacturing process for hot rolling and annealing copper in order to meet the specifications of our customers. There is not a known solution for our ability to switch technologies or to switch to a different renewable energy source. Heavily modified or entirely new equipment, if available, could cost Revere millions of dollars. How the state is going to help companies like Revere address this issue while staying competitive is imperative. (State a question or make a point)

**Point VI** in the Comments by MI relate to the maintaining electric grid reliability. At Revere, our most intensive electricity usage process is that of casting (or melting) recycled copper scrap into a usable product for further processing in our plant. This process sets the pace for our production output. Grid reliability is important for production planning and making sure we can keep up with customer demand. If the grid is down or we have to curtail our electricity we cannot cast and will end up losing finished product. Also, important is the ability to maintain our molten copper

in our furnaces especially during any planned downtime. We cannot allow poor grid reliability for extended periods to allow copper in our furnaces to freeze which would be destructive of the furnace lining and furnace itself resulting in repairs and replacing parts with downtime measured in days with shipments of final products then becoming unreliable to our customers.

The Council needs to ensure that the electricity and natural gas that Revere and other businesses need to maintain jobs in New York State will be affordable and reliable as the CLCPA is implemented. The Draft Plan does not adequately address the cost and reliability concerns raised above and, unless that is fixed, businesses such as Revere may not be able to maintain existing job levels in the State and economic activity will suffer dramatically. Accordingly, Revere implores the Council to address these flaws so that the Final Plan is more transparent and provides a roadmap for CLCPA compliance that is cost-effective, recognizes the heavy, and growing, burdens being imposed on energy consumers, and provides for reliable electricity and natural gas services.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan O'Shaughnessy". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ryan O'Shaughnessy  
Revere Copper Products, Inc.  
VP Finance & CFO