



NEW YORK STATE'S

Energy Transition



This will affect how you cook, how you heat your home, and what you drive. And it will impact your wallet.

SPECIAL PRESENTATION
by Energy Expert Richard Ellenbogen

Tuesday, November 14
7:30 PM

Pelham Picture House

Free admission.

Why NY State Must Rethink Its Energy Plan

PLUS

12 Suggestions to Help Fix the Problems

Richard Ellenbogen – BSEE, MEE November 11, 2023

PRESIDENT – ALLIED CONVERTERS, INC.

www.alliedconverters.com

BELL LABS NEWS
FOR THE PEOPLE OF BELL LABORATORIES
Vol. 19 No. 41 Oct. 15, 1979

For speaker verification
Employees to try out experimental system

For the next six months, 120 employees will dial a special Murray Hill number twice a week and hear a computer say, "This is Bell Labs Automatic Speaker Verification System. Please dial your identification number."

After doing so, they will be asked to recite the test phrase "We were away a year ago," then be told to "Stand by for analysis." Finally, the computer will usually conclude with, "Your identity has been verified. Thank you."

This seemingly odd exchange between employee and computer is an "on-line" evaluation of a voice recognition experiment being conducted by Sadaoki Furuji, a member of the Acoustics Research Department. This work could lead to a system useful to telephone companies in authenticating credit card customers, and to other businesses that require voice identification.

"It's very hard to fool the experimental system," said Furuji. "It can use voice measurements to authenticate a person's claimed identity with an accuracy exceeding 95 percent."

The high accuracy is achieved, Furuji went on, by utilizing a measurement technique called Cepstral Analysis. A computer records, digitizes and transforms voice signals into what is called a spectrum.

"Changes in voice sounds appear in the spectrum as 'peaks' and 'valleys,'" said Furuji. "The computer measures time variations between peaks at intervals (See EMPLOYEES, page 4)

Automated facility developed for testing power converters

A team of Whippany and Western Electric engineers have developed a new automated facility to test power converters—the devices that transform electricity supplied by central office battery plants at high voltage to the low, controlled voltages required by modern electronic switching and transmission equipment.


The facility, at WE's Kearny, N.J., Works, includes a console and three cabinets which house a minicomputer and test equipment. The setup is duplicated at Whippany. Common software and hardware test fixtures are used at the two locations. Plans are being made to place similar sets at other WE locations.

"Before we developed the new facility, converters were tested manually—a complex, time-consuming process," said Jan McElroy, supervisor, Automatic Test and Diagnostic Systems Group. "Now, a technician can perform many more tests—from measuring output voltage to checking a converter's emergency shutdown system—in a fraction of the time and with greater precision and reproducibility."

As converters come off the assembly line, they are plugged into the test facility computer and test results are displayed on a video screen.

"If a problem shows up, the computer probes circuits to locate it," said Rich Ellenbogen, a member of McElroy's group. "Next, the computer prints a label identifying the problem."

Automated facility for testing power converters is demonstrated at Western Electric Works by Rich Ellenbogen, second from right, to WE's John Tardy, foreground, and, standing from left, Bob Stennum, director, Electronic Power Systems Laboratory; Dom Casano, WE director of engineering, and Charles W. Hoover, executive director, Systems Assembly Technology Division.




**BELL LABS ENGINEER
POWER SYSTEMS
LABORATORY
1978 - 1980**

CREDENTIALS

10/27/2019 Westchester Plastics Maker Embraced Renewable Energy Decades Before Gas Moratorium - WSJ

THE WALL STREET JOURNAL.

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<https://www.wsj.com/articles/westchester-plastics-maker-embraced-renewable-energy-decades-before-gas-moratorium-11572174001>

**NEW YORK
Westchester Plastics Maker Embraced
Renewable Energy Decades Before Gas
Moratorium**

Allied Converters saves with cogeneration system and solar panels, while business community worries over potential natural-gas shortage



Richard Ellenbogen installed solar panels at his factory, allowing him to sell about \$21,000 in solar renewable-energy credits a year. PHOTO: THE WALL STREET JOURNAL

By Kate King
Oct. 27, 2019 7:00 am ET

NEW ROCHELLE, N.Y.—Plastics manufacturer Richard Ellenbogen has found a way to keep the lights on: He makes his own electricity.

**RENOVATED FACTORY IN 1998 – 2001
INSTALLED CHP IN 1999 - 2003 & SOLAR IN 2007**

DEFEATED CON ED IN A TARIFF BATTLE IN 2008-2009 TO ALLOW INCREASED CONTRIBUTION OF RENEWABLES TO THE UTILITY SYSTEM. FIRST BUILDING IN NY STATE WITH MULTIPLE SOURCES OF GRID CONNECTED HIGH EFFICIENCY GENERATION

TECHNOLOGY FROM THE FACTORY WAS USED AS THE BASIS FOR A PSC UTILITY CONFERENCE THAT RESULTED IN A REDUCTION OF LINE LOSSES IN NY STATE TOTALING 50,000 – 70,000 MEGAWATT HOURS ANNUALLY

In the Region | Westchester

The New York Times

Going Green: Still Challenging Turf



UNDER THE SUN Solar panels are just one of many energy-saving features in Richard and Maryann Ellenbogen's new house. Credit...Suzanne DeChillo/The New York Times

By Elsa Brenner

- Nov. 14, 2008

**HOME DESIGNED IN 1999
CONSTRUCTION COMPLETED IN 2004**

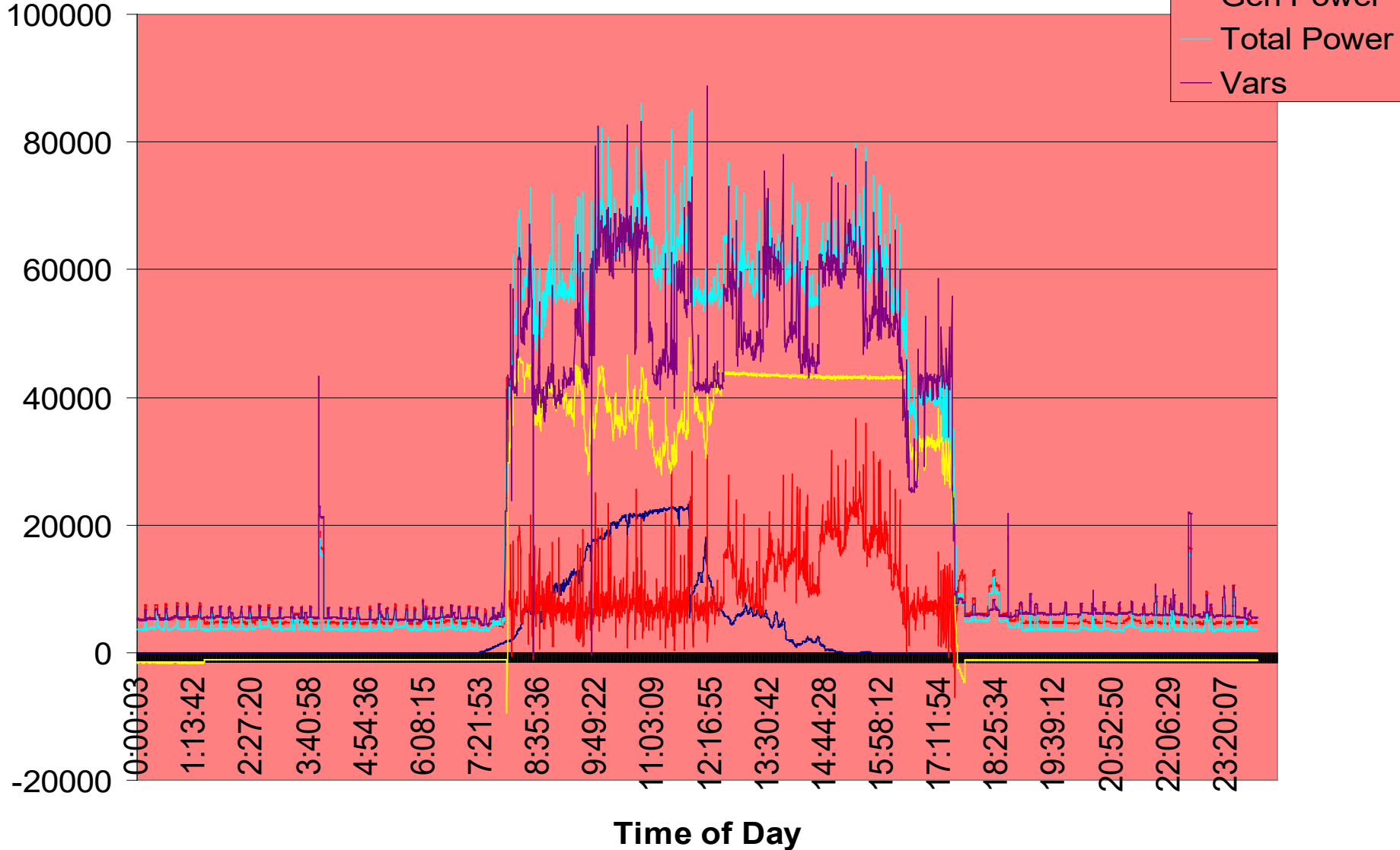
**USES GEOTHERMAL, HIGH MASS RADIANT HEAT AND SOLAR ARRAYS
1.5 ACRES WITH NO CITY WATER USED FOR IRRIGATION**

IN 2008 THE FACTORY WAS OPERATING WITH A TOTAL ENERGY COST 67% LOWER THAN THE AVERAGE COMMERCIAL FACILITY IN WESTCHESTER AND A CARBON FOOTPRINT 30% - 40% LOWER THAN THE UTILITY WHILE USING NATURAL GAS

BETWEEN 2006 – 2022, RECYCLED OR REPURPOSED 100% OF THE INDUSTRIAL WASTE BYPRODUCTS

VIDEO: <https://youtu.be/j4jyg5b5w7M>

Electrical Data - 64 Drake Ave 12-11-2007



- Solar Power
- Grid Power
- Gen Power
- Total Power
- Vars

DATA

**COLLECTED AT
THE FACTORY
ON DECEMBER
11, 2007**

3 ENERGY SOURCES

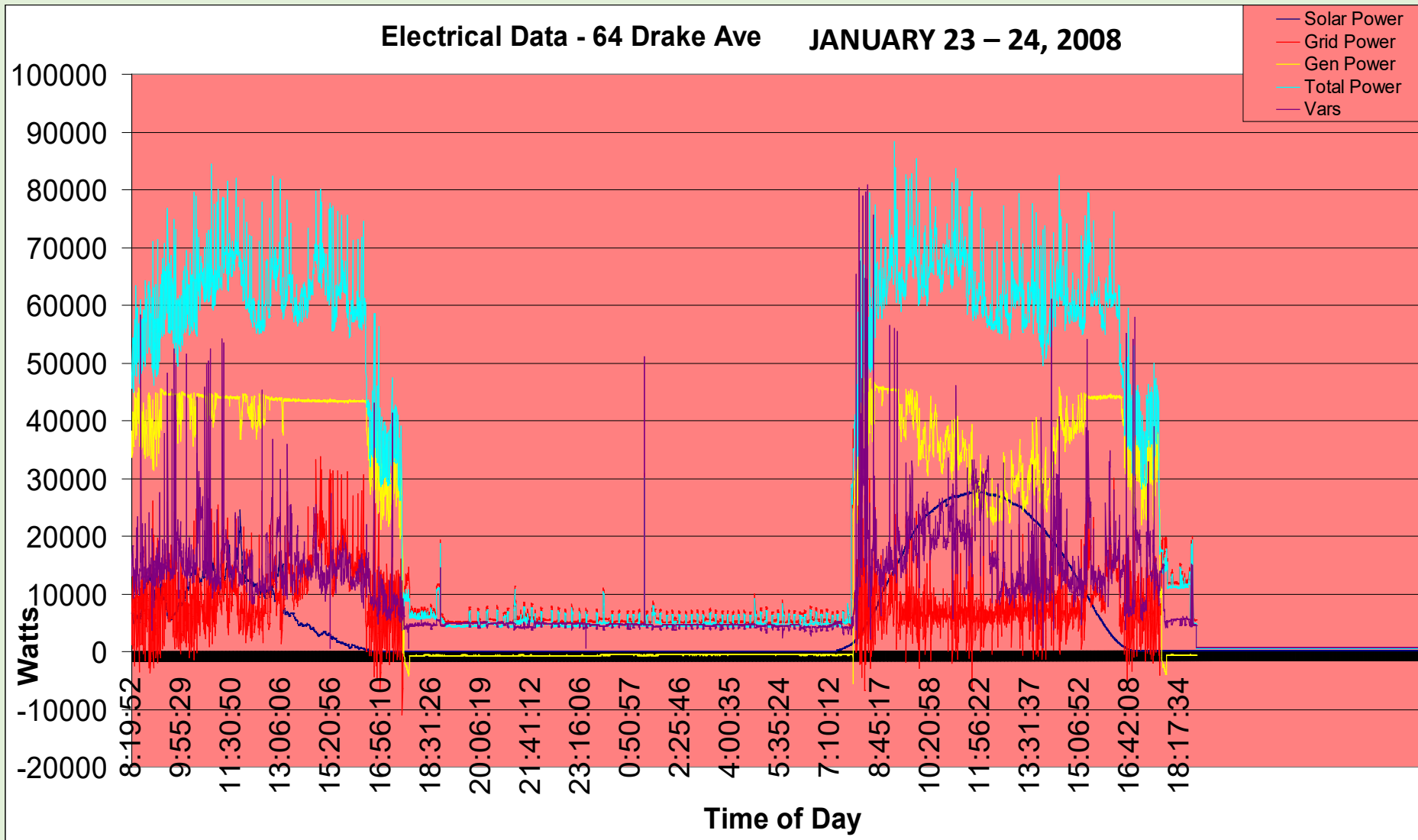
- RED – UTILITY
- DARK BLUE – SOLAR
- YELLOW - GENERATOR
- LIGHT BLUE – TOTAL
- PURPLE – VARS (UTILITY WASTE)

**WHEN THE SOLAR ENERGY
DROPS, THE GENERATOR MAXES
OUTPUT AND THE UTILITY
COMPENSATES**

**OPERATING 100% ON
RENEWABLE GENERATION
WOULD BE IMPOSSIBLE AND THE
AREA REQUIRED FOR A SOLAR
ARRAY TO PROVIDE THAT MUCH
ENERGY WOULD BE AT LEAST
40 TIMES THE AREA OF THE
BUILDING PLUS AN EXTREMELY
LARGE BATTERY INSTALLATION**

FACTORY AFTER POWER FACTOR CORRECTION - FROM A REPORT GIVEN TO THE PSC THAT INITIATED THEIR REACTIVE POWER CONFERENCE IN JULY, 2008

Electrical Data - 64 Drake Ave JANUARY 23 - 24, 2008



3 ENERGY SOURCES

RED - UTILITY

DARK BLUE - SOLAR

YELLOW - GENERATOR

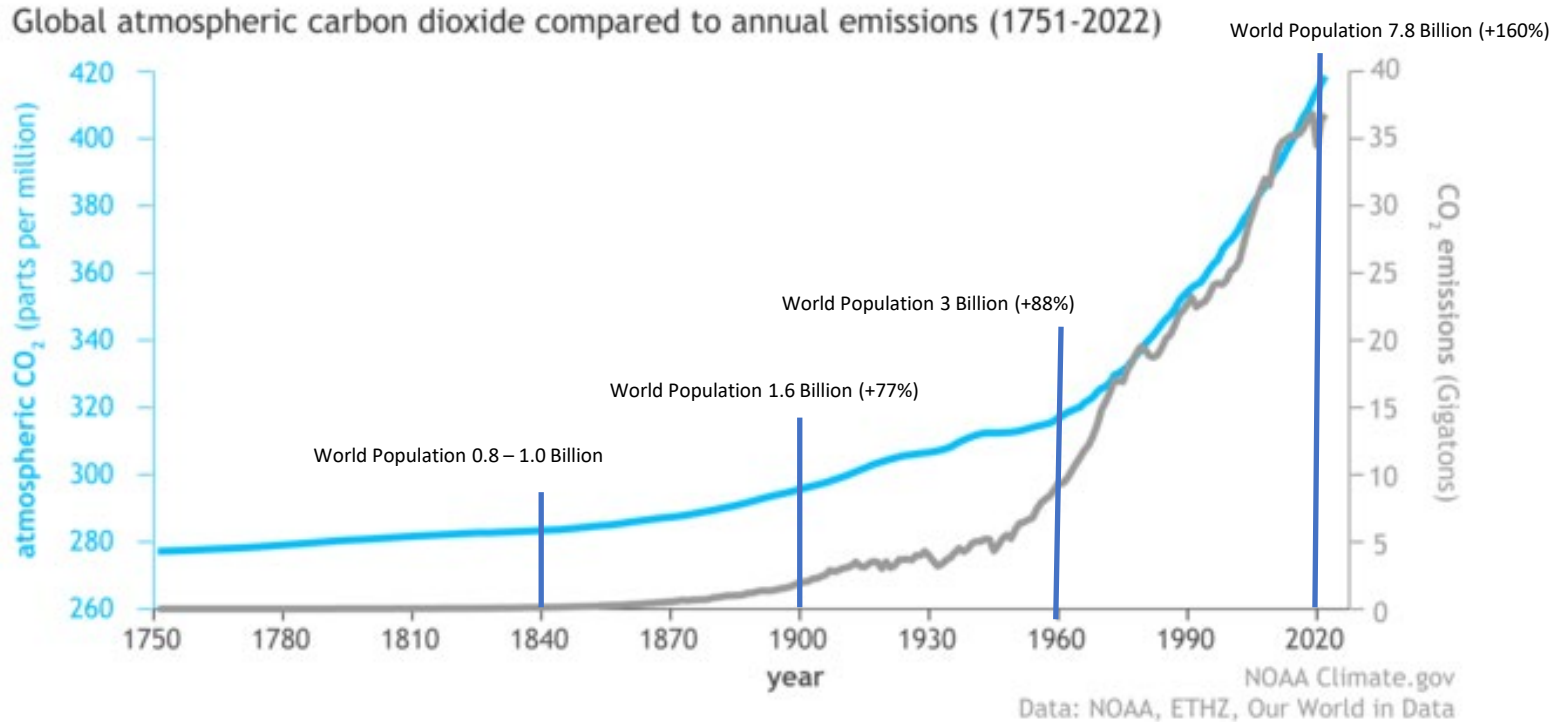
LIGHT BLUE - TOTAL

PURPLE - VARS (UTILITY WASTE)

BY REDUCING VARS, UTILITY LOAD IS REDUCED BY REDUCING CURRENTS AND THE ASSOCIATED LINE LOSSES

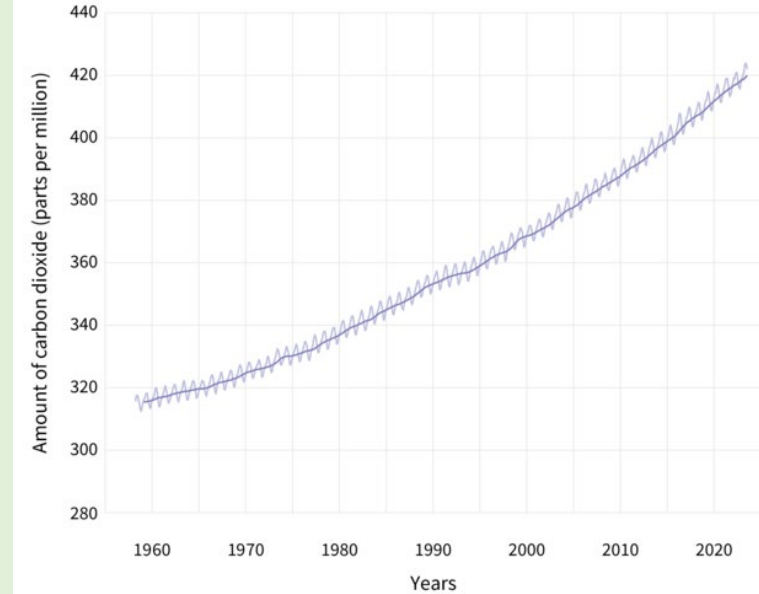
ATMOSPHERIC CO₂ 1750 – 2022

SINCE THE START OF THE INDUSTRIAL REVOLUTION



The amount of carbon dioxide in the atmosphere (blue line) has increased along with human emissions (gray line) since the start of the Industrial Revolution in 1750. Emissions rose slowly to about 5 gigatons—one gigaton is a billion metric tons—per year in the mid-20th century before skyrocketing to more than 35 billion tons per year by the end of the century. NOAA Climate.gov graph, adapted from original by Dr. Howard Diamond (NOAA ARL). Atmospheric CO₂ data from NOAA and ETHZ. CO₂ emissions data from Our World in Data and the Global Carbon Project.

ATMOSPHERIC CARBON DIOXIDE



The modern record of atmospheric carbon dioxide levels began with observations recorded at Mauna Loa Observatory in Hawaii. This graph shows the station's monthly average carbon dioxide measurements since 1958 in parts per million (ppm). The seasonal cycle of highs and lows (small peaks and valleys) is driven by Northern Hemisphere summer vegetation growth, which reduces atmospheric carbon dioxide, and winter decay, which increases it. The long-term trend of rising carbon dioxide levels is driven by human activities. At Mauna Loa, the highest monthly value each year occurs in May. In May 2023, carbon dioxide hit 424 ppm—a new record. NOAA Climate.gov image, based on Mauna Loa monthly mean data from NOAA Global Monitoring Lab.

**MODERN RECORD OF
ATMOSPHERIC CO₂ BEGAN WITH
OBSERVATIONS AT MAUNA LOA
OBSERVATORY IN HAWAII IN 1958**

DENYING CLIMATE CHANGE WILL NOT MITIGATE ITS IMPACTS ON SOCIETY

BANNING SCIENCE BOOKS THAT HAVE INFORMATION THAT YOU DON'T LIKE WILL NOT SOLVE THE PROBLEM – IT WILL JUST LEAVE SOCIETY UNPREPARED FOR THE IMPENDING REALITY

- **Texas Republicans Target Climate Science in Textbooks Ahead of Education Board Vote**
- **Republican Railroad Commissioner Wayne Christian wants the Texas Board of Education to reject new science textbooks, which accurately describe the causes and effects of climate change.**

NOVEMBER 10, 2023

“DESPITE WHAT MAINSTREAM MEDIA REPORTS, THE DEBATE OVER CLIMATE CHANGE IS FAR FROM SETTLED, AS NONE OF THE CATASTROPHIC EVENTS THEY PREDICTED IN THE LAST 20 YEARS HAVE OCCURRED”

- <https://insideclimatenews.org/news/10112023/todays-climate-texas-republicans-climate-science-textbooks-education-board-book-ban/>

- **THE OCEANS ARE WARMING**
- **GLACIERS AND THE POLAR ICE SHELVES ARE MELTING AT INCREASING RATES**
- **SEA LEVELS ARE RISING - COASTAL FLOODING IS INCREASING**
- **STORMS ARE GETTING STRONGER & MORE DAMAGING**
- **FORESTS ARE DECAYING BECAUSE FREEZES ARE NOT KILLING INSECTS**
- **WEATHER EVENTS ARE BECOMING MORE EXTREME AND ARE EXCEEDING THE DESIGN LIMITS OF THE EXISTING INFRASTRUCTURE**
- **FOOD PRODUCTION IS BEING IMPACTED BY EXTREME DROUGHTS AND FLOODS**

**BUT RUNNING AROUND LIKE CHICKEN LITTLE AND
SAYING THAT THE SKY IS FALLING WHILE
IMPLEMENTING SOLUTIONS THAT ARE AS DEVOID OF
SCIENCE AND MATH AS THE CLAIMS BEING MADE BY
THE CLIMATE DENIERS
WILL NOT SOLVE THE PROBLEM.**

IT WILL ONLY MAKE IT WORSE!

**COMPLEX PROBLEMS USUALLY DON'T LEND THEMSELVES
TO SIMPLISTIC SOLUTIONS**

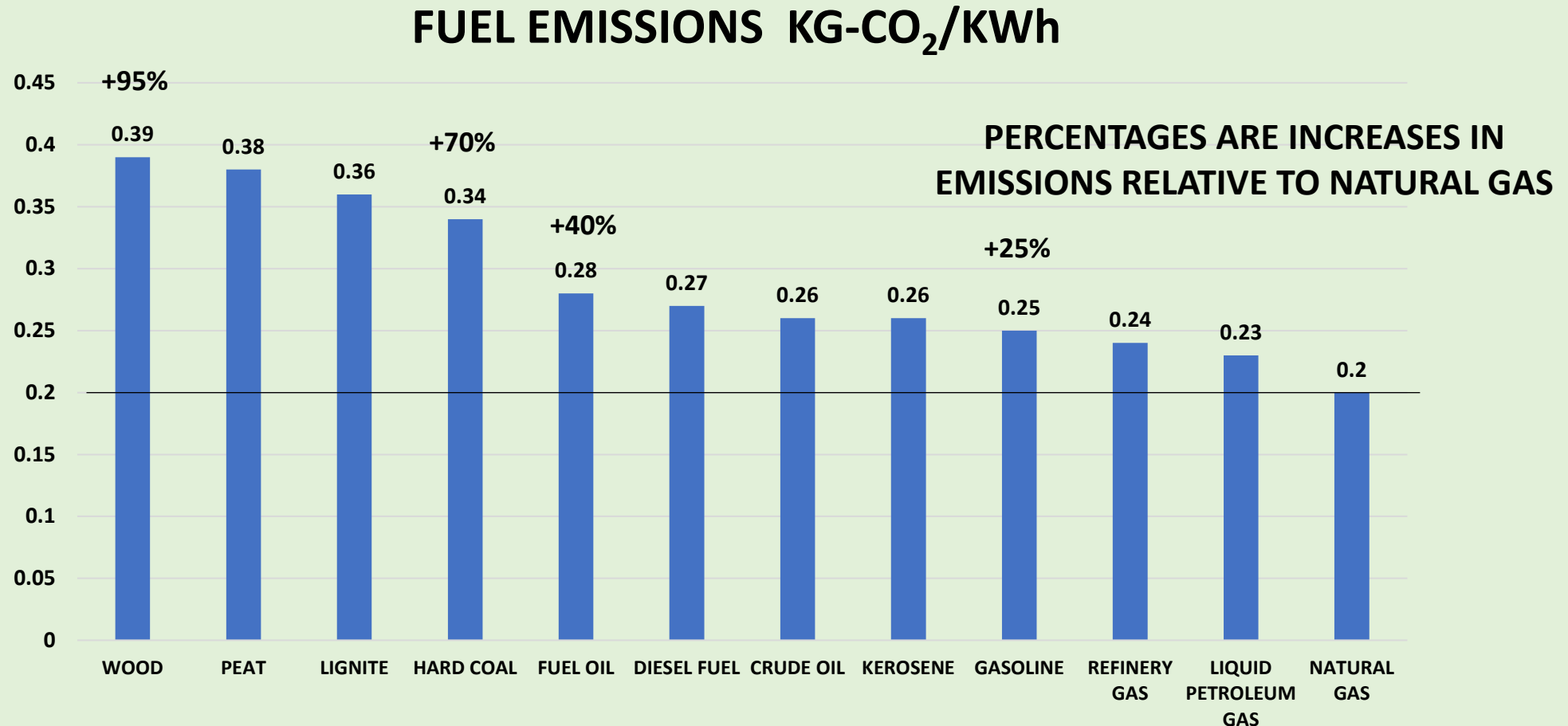
**THE NY STATE ENERGY PLAN WILL TAKE EIGHTY YEARS TO
IMPLEMENT UNDER THE BEST OF CIRCUMSTANCES
IF IT IS EVEN POSSIBLE TO EVER IMPLEMENT IT**

WE DON'T HAVE THE RESOURCES OR THAT MUCH TIME

**ONCE YOU UNDERSTAND THE DETAILS, THE SCALE OF THE
ISSUES BECOMES APPARENT**

THE PROBLEM IS THAT THE EXPLANATION REQUIRES MORE THAN A TWEET

EMISSIONS OF DIFFERENT FUEL TYPES



IN ADDITION TO CO₂, WOOD COMBUSTION YIELDS VERY HIGH PARTICULATE EMISSIONS. NATURAL GAS HAS FEW, IF ANY, PARTICULATE EMISSIONS AND MUCH LOWER NO_x AND SO_x EMISSIONS THAN THE OTHER FUELS

WHY IS NY STATE ENERGY POLICY A MESS?

- **“FOLLOW THE SCIENCE”. YOU CAN’T ONLY ACCEPT THE RESULTS OF CHEMISTRY, MATH, PHYSICS, AND ECONOMICS WHEN THEY FIT YOUR WORLDVIEW. THEY FREQUENTLY ARE A BUMMER.**
- **ENERGY POLICY HAS BEEN DECENTRALIZED AND IS BEING DICTATED BY MULTIPLE ENTITIES, ONLY ONE OF WHICH UNDERSTANDS THE SYSTEM AND IS REQUIRED BY FEDERAL LAW TO KEEP THE LIGHTS ON (THE PSC)**
- **COSTS ARE GOING TO SKYROCKET BECAUSE OF MANDATES SET IN PLACE BY THE CLCPA (CLIMATE LEADERSHIP AND COMMUNITY PROTECTION ACT) A REALISTIC COST/BENEFIT ANALYSIS HAS NOT BEEN DONE ON MANY OF THE PROPOSALS INCLUDED IN THE CLCPA.**
- **BECAUSE OF THOSE MANDATES, THE PSC HAS LOST CONTROL OF THE ABILITY TO CONTROL BOTH LOAD AND GENERATION AND CAN NO LONGER FULFILL ITS OBLIGATIONS WITH ANY DEGREE OF CERTAINTY**
- **ENERGY LOSSES AND INEFFICIENCIES ARE GOING TO INCREASE BECAUSE OF THE SAME MANDATES**
- **GREENHOUSE GAS EMISSIONS ARE GOING TO DECREASE FAR LESS RAPIDLY THAN WOULD OTHERWISE BE POSSIBLE BECAUSE THE MANDATES CONTAINED IN THE CLCPA RUN COUNTER TO MATH, PHYSICS, AND THE CONSTRUCTION OF THE UTILITY SYSTEM**
- **YOU CAN’T START A SCIENTIFIC OR ENGINEERING PROCESS WITH AN AGENDA THAT ELIMINATES POSSIBLE SOLUTIONS BEFORE PERFORMING A MATHEMATICAL ANALYSIS AND A **REALISTIC** COST BENEFIT ANALYSIS ON ALL OF THE SOLUTIONS**

IN 2022, 8% OF THE WORLD'S ENERGY WAS PRODUCED BY RENEWABLES (3.6% NON-HYDROPOWER)

AT THE PRESENT RATE OF RENEWABLE INSTALLATION:

- **IT WILL TAKE 30 YEARS (WITH NO DEGRADATION) TO INSTALL ENOUGH SOLAR AND WIND TO OFFSET THE WORLD'S 22,000 TWh OF ELECTRICAL GENERATION ****

22,000 TWh IS 1375 TIMES WHAT WAS PRODUCED BY INDIAN POINT PRIOR TO ITS CLOSING, WHICH PRODUCED 25% OF NY CITY'S ENERGY

- **THE SOLAR AND WIND EQUIPMENT DOES DEGRADE AND ONLY LASTS APPROXIMATELY 25 – 30 YEARS AND WILL NEED TO BE REPLACED**
- **IT WILL TAKE 300 YEARS TO OFFSET ALL OF THE WORLD'S ENERGY NEEDS USING SOLAR AND WIND****
- **BECAUSE OF THEIR LOW POWER DENSITY (Watts/Acre), SOLAR AND WIND OCCUPY ENORMOUS AREAS. AS MORE GENERATION IS INSTALLED, IT WILL BECOME MORE DIFFICULT TO FIND SUITABLE SITES. THIS IS ALREADY OCCURRING AROUND THE GLOBE AND IN MANY AREAS WITHIN NY STATE**

**** BASED UPON 2022 DATA FROM IRENA - INTERNATIONAL RENEWABLE ENERGY AGENCY www.irena.org**

WHAT DO WE WANT FROM AN ENERGY SYSTEM?

- **RELIABILITY**
- **AFFORDABILITY – LOW COST**
- **CLEAN AND EFFICIENT**

A CLEAN AND EFFICIENT SYSTEM WILL USUALLY, BY ITS NATURE, HAVE LOWER COSTS BUT THERE ARE CAVEATS TO THAT STATEMENT. WITH NY STATE'S PLAN, THAT WILL NOT OCCUR. IF GERMANY IS ANY INDICATOR, ENERGY COSTS IN NY STATE WILL DOUBLE UNDER THE CLCPA AND THAT IS ALREADY STARTING TO OCCUR. CON ED'S RECENT RATE INCREASES ARE PRIMARILY TO ACCOMMODATE REQUIREMENTS OF THE CLCPA.

ADDITIONALLY, RELIABILITY AND CARBON REDUCTION WILL BOTH BE NEGATIVELY IMPACTED

HOW IS NY STATE DOING AGAINST THOSE 3 METRICS

- **RELIABILITY**

THE NYISO HAS ISSUED A WARNING ABOUT DOWNSTATE SYSTEM RELIABILITY STARTING IN 2023 AND GOING UNTIL 2033

- **AFFORDABILITY – LOW COST**

**AS OF 12/2022, 1.2 MILLION NY STATE UTILITY CUSTOMERS WERE \$1.8 BILLION IN ARREARS
NY STATE HAS THE EIGHTH HIGHEST UTILITY RATES IN THE COUNTRY AND ZONES J (CON ED)
& K (LONG ISLAND) HAVE SOME OF THE HIGHEST RATES IN THE COUNTRY-60% OF THE POPULATION**

- **CLEAN AND EFFICIENT**

THE UTILITY SYSTEM'S CARBON FOOTPRINT HAS INCREASED AFTER THE CLOSURE OF INDIAN POINT AND IT IS GOING TO INCREASE MORE OR DECREASE FAR SLOWER THAN IS OTHERWISE POSSIBLE

HUMAN INDUCED CLIMATE CHANGE IS REAL

METHANE IS AN ISSUE

BUT REMOVING LOCAL SUPPLIES OF NATURAL GAS AND FOSSIL FUEL GENERATION WILL DECREASE THE RATE OF CO₂e REDUCTION IN NEW YORK STATE

PEOPLE PUSHING THE “NO GAS” AGENDA ARE TOO FOCUSED ON A SINGLE ISSUE AND ARE NOT SEEING THE BIGGER PICTURE

RESOURCES ARE BEING SQUANDERED ON TECHNOLOGIES THAT ARE NOT GOING TO RESULT IN LARGE CARBON REDUCTIONS

INCLUDING THE BATTERIES SPECIFIED IN THE RECENTLY RELEASED NY STATE ENERGY STORAGE ROADMAP, THE COST OF THE CLCPA AS IT IS WRITTEN TO ACTUALLY GET THE SYSTEM TO WORK COULD EXCEED

\$4 TRILLION

WORSE, THE CLCPA IS ACTUALLY GOING TO CAUSE AN INCREASE IN CARBON EMISSIONS IN NY STATE. THE MICRON FACILITY IN CLAY, NY IS A CLEAR EXAMPLE OF THAT.

TRANSMISSION LINE LOSSES CAUSED BY THE CLCPA RELATED TO THE MICRON FACILITY IN CLAY, NY COULD EXCEED 500 GWh ANNUALLY.

CORNELL UNIVERSITY USES 200 GWh ANNUALLY FOR ITS ENTIRE ITHACA CAMPUS

NYP&A HAS COMMITTED TO ALLOCATING 140 MW OF HYDRO GENERATION TO MICRON EXCEPT THAT EXCESS HYDRO DOESN'T EXIST

EXPLANATION ON SLIDE 47 AND UNDER “ADDITIONAL INFORMATION” AT THE END OF THE POWERPOINT

\$ 4 Trillion Dollar Analysis

Excluding the cost of Renewable Generation

The Cost of the CHPE has now increased to \$6 Billion. That is a 235% increase in inflation adjusted dollars since it was first proposed in 2011 and approved in 2013. That is just for one Power Cable. It will be Operational in 2026. (15 Years)

Does anyone really believe that every transformer, street and building in NY State can be rewired for less than 100 times that cost? Plus, there is the additional cost of new equipment. Minimum Cost \$600 Billion.

NYSERDAS Own Storage Report shows a \$3.4 Trillion Battery Cost At 2022 Storage Costs And The Batteries Will Only Last 10 Years - THEY WILL WEAR OUT BEFORE THE DEBT SERVICE IS PAID ON THEM

Champlain Hudson Power Express Announces Financial Close

November 1, 2022

New York – November 1, 2022 – Today, *Champlain Hudson Power Express* (CHPE) announced it has closed on the financing required to begin construction on the approximately 339-mile fully-buried transmission line that will deliver 1,250 megawatts of clean and renewable hydropower from Québec to New York City. The overall project cost is approximately \$6 billion. The lead financial advisor on the deal was Societe Generale supported by Coordinating Lead Arrangers Societe Generale, MUFG, Mizuho and CIBC. Kirkland and Ellis LLP served as counsel for the Blackstone/CHPE team while Norton Rose Fulbright represented lenders. Marsh served as insurance broker and risk advisor to CHPE.

Financial close is the last step before the transformative project can begin construction this fall and also begin delivering significant project benefits throughout New York State by distributing funds to community partners, initiatives and municipalities, including:

NY STATE POLICY IS CREATING A SITUATION WHERE OLDER POLLUTING GENERATING PLANTS ARE BEING LEFT OPERATING

THE ILLUSION IS THAT THEY WILL BE REPLACED WITH RENEWABLE GENERATION EXCEPT THE STATE DOES NOT HAVE SUFFICIENT RESOURCES TO REPLACE ALL OF THE ENERGY SO THEY WILL STAY OPEN FOR DECADES

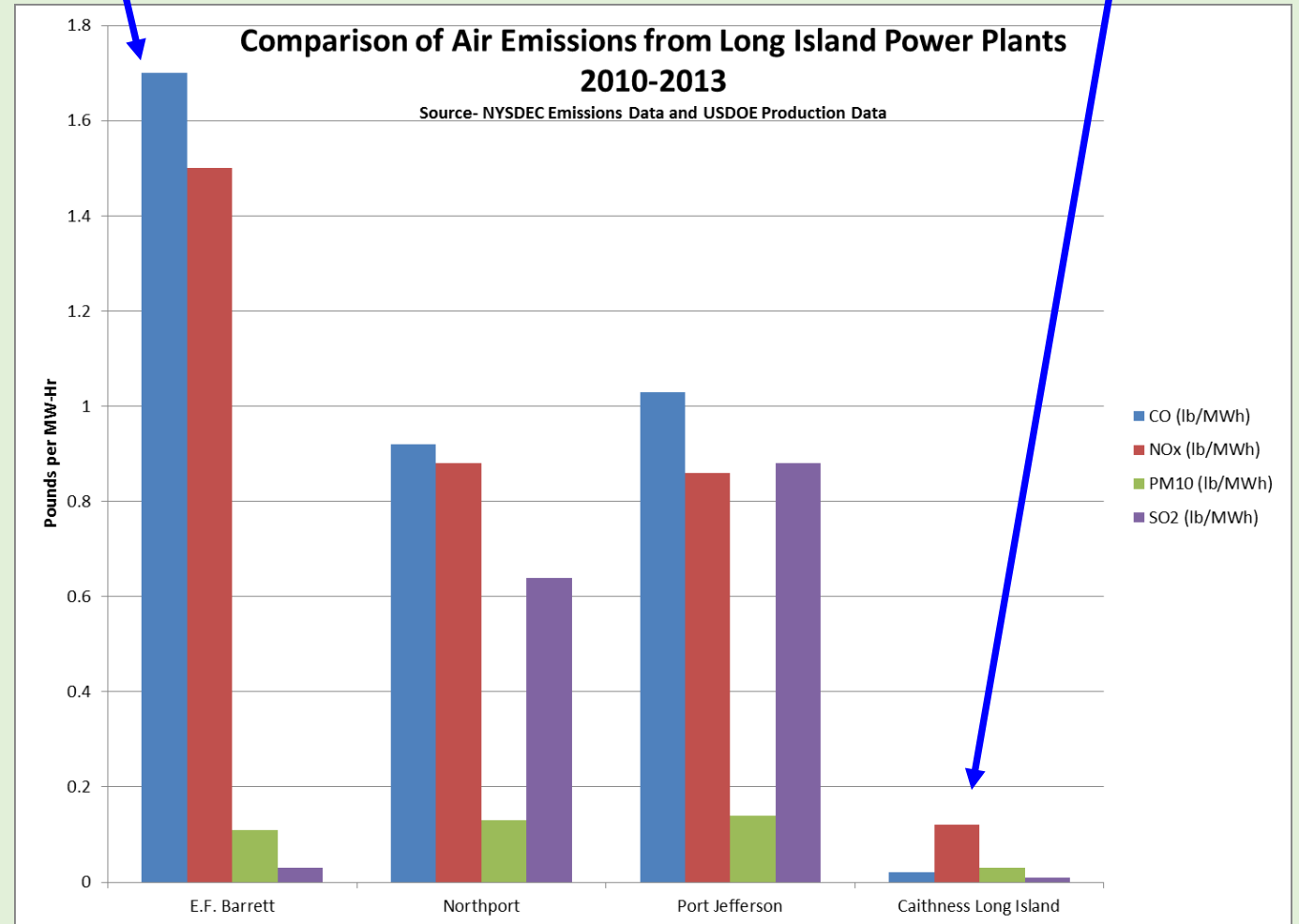
JUST RECENTLY, THE NYISO STATED THAT THEY CANNOT CLOSE THE DIRTY PEAKER PLANTS IN 2025 AS WAS ORIGINALLY MANDATED JUST A FEW YEARS AGO

In sharp contrast, the approximately 350 MW Caithness Long Island plant, which went into commercial operation in 2009, has much lower emissions

SEE SLIDE 79 FOR DATA

THE FALSE PROMISE OF OVERLY ABUNDANT ZERO CARBON RENEWABLE ARE RESULTING IN PLANTS LIKE THIS STAYING OPEN

WHAT CAN BE ACHIEVED QUICKLY WITH RETOOLING OF OLDER GENERATING PLANTS





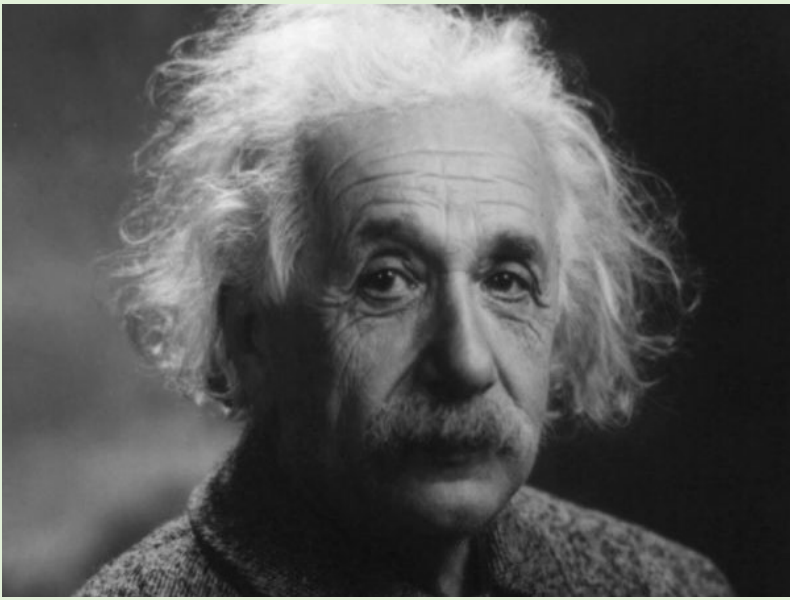
**The Pessimist
complains about
the wind;**

**The Optimist
expects it to
change;**

**The Realist
adjusts the sails.**

William Arthur Ward

**NY STATE MUST ADJUST ITS SAILS QUICKLY TO AVERT A CATASTROPHE
FOR BOTH THE SAFETY OF ITS RESIDENTS AND TO SAVE ITS ECONOMY**



Insanity Is Doing the Same Thing Over and Over Again and Expecting Different Results

Albert Einstein

**THE CLIMATE LEADERSHIP AND COMMUNITY PROTECTION ACT IS NOT
LEADERSHIP AND IT WILL NOT PROVIDE PROTECTION AGAINST ENERGY
FAILURES FOR NYS COMMUNITIES**

**NY STATE IS FOLLOWING A PLAN THAT HAS BEEN TRIED IN GERMANY FOR 33
YEARS AND HASN'T WORKED**

WHY DOES NY STATE BELIEVE THAT THEY CAN GET IT TO WORK IN 17 YEARS ?

**GERMANY HAS REOPENED COAL GENERATING PLANTS AND RECENTLY SIGNED AN AGREEMENT WITH QATAR TO IMPORT
30 MILLION METRIC TONS OF LIQUID NATURAL GAS (15 YEARS AT 2 MILLION TONS PER YEAR)**

FUTURE SITE OF EIGHTY-THREE 600 FOOT TALL WIND TURBINES

340 Megawatts 30,000 ACRES (47 SQUARE MILES) 520 FOOT DIAMETER BLADES
ALLEGANY, CATTARAUGUS, AND WYOMING COUNTIES, NY <https://allecattwind.invenergy.com/>

The Alle-Catt Wind Farm will boost the local economies of Allegany, Cattaraugus and Wyoming Counties

The project enjoys the support of over 300 local tax-paying residents, crosses three county lines and will generate a tremendous amount of energy and income for the local communities. Invenergy is developing Alle-Catt on approximately 30,000 acres of private land it is leasing in the towns of Arcade, Centerville, Farmersville, Freedom, Rushford and Machias.

The Population of the three counties is 162,799 as of July 1, 2022 according to a U.S. Census Estimate (99.8% have not registered support)



TEXT ABOVE, IN ITALICS, IS COPIED FROM THE ALLE-CATT WEBSITE

<https://storymaps.arcgis.com/stories/89db52cf06b24116827a9f2e33206a0f>

http://www.windmeasurementinternational.com/wind-turbines/turbine_sound-measurement.php

<https://www.theglobeandmail.com/business/article-what-the-death-of-ontarios-green-energy-dream-can-teach-other/>

109 dBA 72 dB @ 400' 45 dB @ 8955' 42 dB @ 12,650'
67.6 dB 660'

RURAL RESIDENTIAL AMBIENT NOISE LEVEL IS 39 dB
WITHIN 300 FEET OF CONTINUOUS HEAVY TRAFFIC 72 dB

<https://www.omnicalculator.com/physics/distance-attenuation#sound-attenuation-formula>

SIMILAR ISSUES IN ONTARIO, CANADA IN 2019

OBSTACLES TO IMPLEMENTATION

- **LACK OF LAND BUT AN ABUNDANCE OF NIMBY SENTIMENT**
NY STATE HAS MORE LAWYERS PER CAPITA THAN ANYWHERE BUT WASHINGTON, D.C.
- **UTILITY SYSTEM IS WIRED “BACKWARDS” MAKING INTERCONNECTION OF RENEWABLE GENERATION DIFFICULT** – High Interconnection Costs Are Resulting In Numerous Project Cancellations
- **THE JONES ACT WILL SLOW THE RATE OF OFFSHORE WIND INSTALLATION** – Lack of Jack Ships
- **MAJOR SUPPLY CHAIN DISRUPTIONS IN THE OFFSHORE WIND INDUSTRY AND INFLATION ISSUES****
- **LACK OF LABOR – LOW UNEMPLOYMENT – NO TRAINED WORKFORCE**
- **EXTREMELY INSUFFICIENT FUNDING FOR THE MAGNITUDE OF THE PROJECT**
- **HIGH COSTS OF COMMODITIES SUCH AS LITHIUM, COPPER AND ALUMINUM**
- **SHORTAGE OF TRANSFORMERS AND OTHER EQUIPMENT**
- **WILL REQUIRE 60 YEARS TO REWIRE THE UTILITY SYSTEM FOR FULL ELECTRIFICATION**
- **HIGHER INTEREST RATES RAISE PROJECT COSTS**
- **ACUTE LACK OF ENERGY NEEDED TO OFFSET THE LOADS BEING PLANNED**
- **** ADDED 10/12/2023 - PUBLIC SERVICE COMMISSION DENIED REQUESTS BY WIND INSTALLERS FOR INFLATIONARY ADJUSTMENTS**

Some commonly asked questions:

How long will the transition take? The plan calls for all new electricity generation to come from wind, water, and sun by 2020, leading to 80-85% conversion by 2030 and all fossil-fuel use fully phased out by 2050.

Is there any precedent for such a rapid technological transition? Yes, many. For example, cars replaced horse-drawn carriages as the major means of transportation in the US in just 10 to 20 years between 1910 and 1930.

Are the necessary technologies available now? Yes, the plan relies only on presently available technologies already in commercial use. Engineers have made amazing progress over the past decade, and with support and investment will continue to do so. The time is ripe for moving quickly to renewables.

Won't the transition be expensive? No, many forms of renewable energy are already cost effective compared to fossil fuels (even without considering the external costs to health and global warming), and will only become more so in the future.

What happens when the winds are calm, or at night? The plan calls for storing energy in a variety of ways, and for connecting wind turbines across a large area. (with diverse wind patterns). There is no need for base-load production from coal.

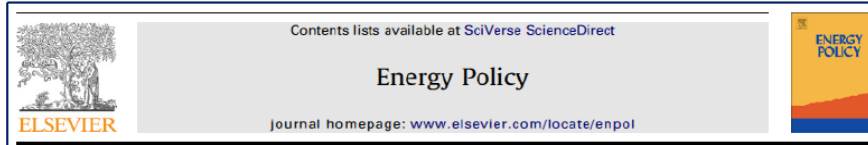
Can't shale gas serve as a bridge fuel, until renewables can be fully deployed? Shale gas is disastrous in terms of global warming, competes with renewables in terms of scarce capital for energy investment, requires large-scale industrialization of the landscape, and simply is not needed.

Does the plan call for nuclear energy? No. Unsolved issues of waste disposal and other dangerous risks make nuclear an unacceptable option, and renewable energy is less expensive.

Don't wind turbines kill birds? Pollution from coal and natural gas kill more than 10 times as many birds as wind turbines, per kilowatt of electricity produced.

The 2030 plan: The time is NOW!

The 2030 Plan for a fossil-fuel free New York



Examining the feasibility of converting New York State's all-purpose energy infrastructure to one using wind, water, and sunlight

Mark Z. Jacobson^{a,*}, Robert W. Howarth^b, Mark A. Delucchi^c, Stan R. Scobie^d, Jannette M. Barth^e, Michael J. Dvorak^a, Megan Klevze^a, Hind Katkhuda^a, Brian Miranda^a, Navid A. Chowdhury^a, Rick Jones^a, Larson Plano^a, Anthony R. Ingraffea^f

^a Atmosphere/Energy Program, Department of Civil and Environmental Engineering, Stanford University, Stanford, CA 94305, USA
^b Department of Ecology and Evolutionary Biology, Cornell University Ithaca, NY 14853, USA
^c Institute of Transportation Studies, U.C. Davis, Davis, CA 95616, USA
^d PSE Healthy Energy, NY, USA
^e Pepecton Institute LLC, USA
^f School of Civil and Environmental Engineering, Cornell University, Ithaca, NY 14853, USA

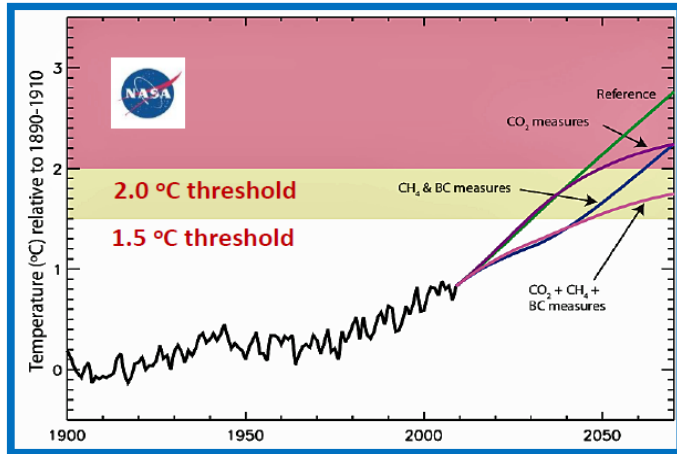
In **March 2013**, a team of scientists and engineers from Stanford, Cornell, and other institutions published a peer-reviewed study calling for an aggressive transition to make New York State completely free of fossil fuels. All energy for electricity generation, transportation, heating, and industry, would come from the wind, water, and sun.

The plan uses only presently available technologies already in commercial use. This cost-effective plan saves lives, reduces global warming, and increases the energy security and competitiveness of New York.



Cornell University

Why the plan? Urgent need to slow global warming, and to reduce illness and death from fossil-fuel driven pollution. The plan offers New York an alternative to shale gas, with far greater benefits and fewer risks.



Source: Drew Shindell and others (2012). Simultaneously mitigating near-term climate change and improving human health and food security. *Science* 335: 183-189.

The Earth has already warmed by 0.7 degree C, and is on track to warm to 1.5 degrees within 17 years and 2.0 degrees within 20 years. Such temperatures pose serious risk of spiraling feedbacks, leading to further uncontrollable warming. To avoid this requires huge reductions in both carbon dioxide and methane emissions. Over the coming few decades, controlling methane is essential. Yet natural gas is the largest source of methane pollution in the US, and shale gas only aggravates this.

We simply must end our addiction to fossil fuels, including coal, oil, and natural gas.

Fossil-fuel driven air pollution causes widespread illness, lost time from work and school, and 4,000 deaths each year in New York State. **This illness and death costs the residents and taxpayers of New York \$33 BILLION every year.**

The plan:

- **Calls for use of electric vehicles, and high-efficiency electric heat pumps for commercial and domestic heating (resulting in 37% less total energy use, simply due to greater efficiencies of these modern technologies).**
- **Uses the most environmentally benign generation technologies for electricity (as one example, the plan details the costs and benefits of using 40% offshore wind, 10% onshore wind, 28% photovoltaic, 10% concentrated solar, and 12% geothermal, hydro, tidal, and waves).**
- **Relies only on technologies that are commercially available today.**
- **Uses a variety of energy storage techniques and approaches for balancing demand to production (hydrogen generation, flywheels, compressed air, pumped hydroelectric, batteries, and seasonal heat storage through geothermal storage all play a role).**
- **Is cost effective (the \$570 billion price tag over 20 years is less than the health-care savings from reduced air pollution).**
- **Leads to greater energy security, and more stable energy pricing into the future.**
- **Creates far more jobs than does the continued reliance on fossil fuels.**
- **Is only a start. The creative minds of New Yorkers can build on it, and make it even better. Yet even in this beginning stage, the plan is so much better than the continued use of coal, oil, and natural gas.**

The full paper behind the plan is available on line at <http://www.stanford.edu/group/efmh/jacobson/Articles/I/NewYorkWWSEnPolicy.pdf>

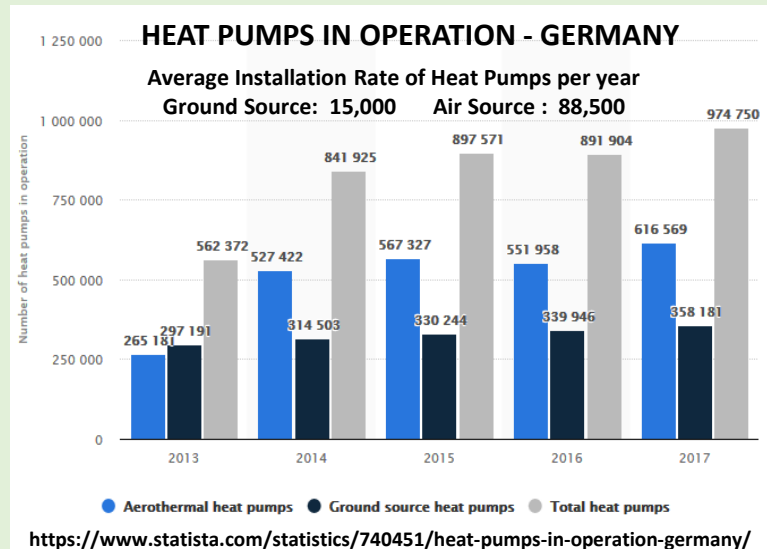
**CONVERTING GAS COMBUSTION TO HEAT PUMPS
WILL NOT REDUCE ATMOSPHERIC CARBON
EMISSIONS OR ENERGY PRICES ON A GENERATION
SYSTEM SUPPORTED BY FOSSIL FUELS**

**GERMANY HAS A 33 YEAR HISTORY OF FAILURE
WITH THIS IDEA**

**AFTER 33 YEARS, GERMANY WHICH HAS CHOSEN THIS ROUTE IS SUPPLIED BY 34%
RENEWABLE GENERATION AND HAS ENERGY COSTS TWICE THOSE OF FRANCE WHICH IS
70% NUCLEAR, 10% HYDRO**

**FRANCE IS CURRENTLY OPERATING 55 NUCLEAR REACTORS TOTALING 61.3 GW AND BUILT BETWEEN 1978 and 1999, A PERIOD OF 21 YEARS,
WITH A CAPABILITY OF 480 TWh at 0.90 CF AND IS BUILDING 14 NEW REACTORS TO GO ONLINE BY 2035**

Heat Pumps Overtake Gas in Germany



- **Apr 23, 2018 - GERMANY: Heat pumps are said to have overtaken gas for the first time in 2017 to become the most popular form of domestic heating in Germany.** Based on figures released by the Federal Statistical Office, the *German heat pump association BWP* reveals that *heat pumps* were installed in 43% of new residential buildings in 2017.

<https://www.coolingpost.com> > *World News*

In Germany & in New York, Replacing Gas Combustion with Air-Air Heat Pumps on a grid that is not supported by nearly 100% Carbon Free Generation DOES NOT reduce CO2 Footprint

IT JUST MOVES THE CO₂ EMISSIONS TO A DIFFERENT LOCATION WITH AN AS LARGE OR LARGER CO₂ FOOTPRINT AND WITH MUCH HIGHER OPERATING COSTS !

COST TO DELIVER ONE THERM OF ENERGY AT THE CUSTOMER PREMISES USING VARIOUS HEATING METHODS (In the NY Metro Area)



GERMANY – A CAUTIONARY EXAMPLE

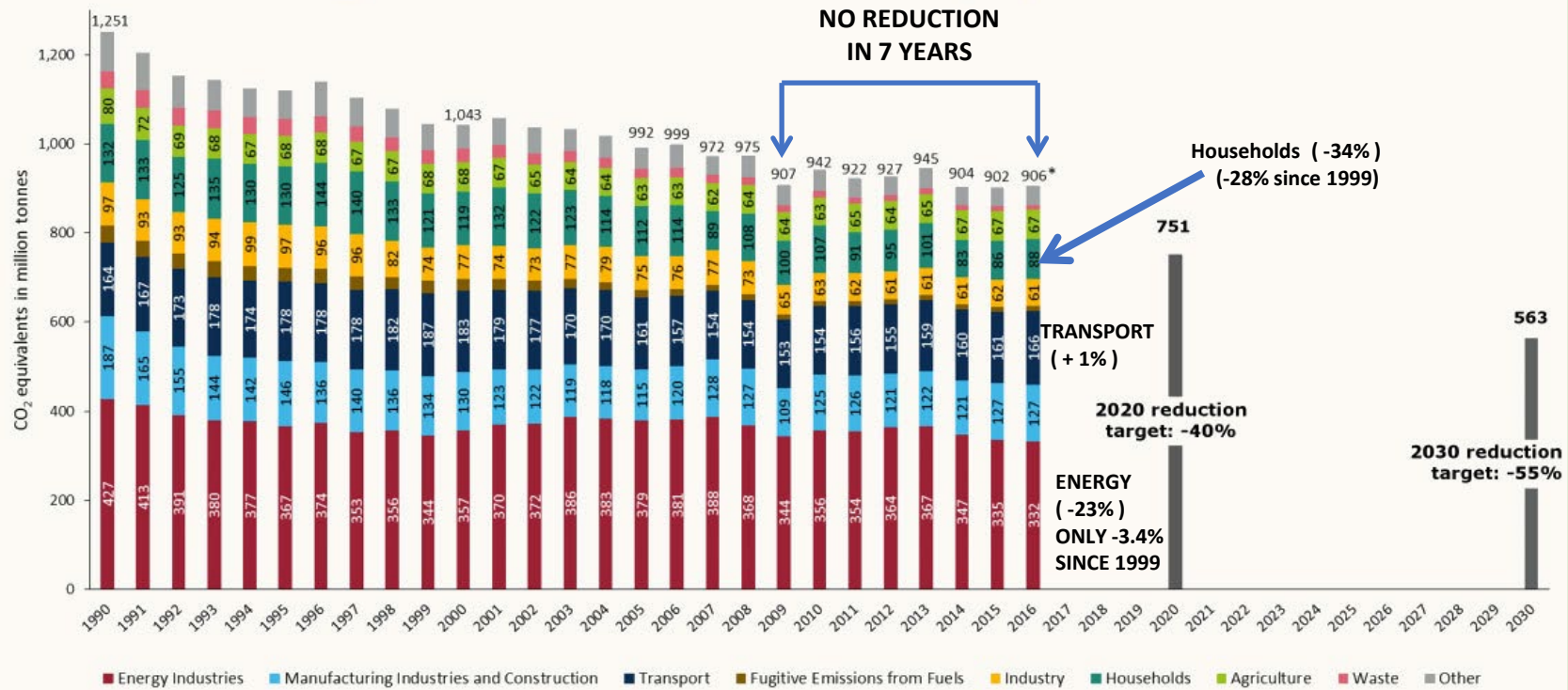
AFTER 30 YEARS, 30,000 WIND TURBINES INSTALLED, AND SOARING ENERGY COSTS, GERMANY IS MISSING IT'S GHG TARGETS. WHY ?

NOT ENOUGH RESOURCES WERE DEVOTED TO REDUCING THE CARBON FOOTPRINT OF TRANSPORTATION AND THE ENERGY INDUSTRY AND TOO MUCH ELECTRIC LOAD WAS ADDED WITHOUT SUFFICIENT RENEWABLE GENERATION TO COMPENSATE FOR THE ADDITIONAL LOAD.

(Those Accounted for 47% of GHG in 1990 - Reduced by only 16% in 27 years - 6% since 1999 - They Account for 66% of GHG now)

WITH THE CURRENT NY PLAN, GERMANY'S PAST 30 YEAR HISTORY IS NEW YORK'S FUTURE

Greenhouse gas emission trends in Germany by sector 1990-2016.



SOLAR PANELS – BAVARIA, GERMANY – DECEMBER 2022

EVERY SOLAR ARRAY IN GERMANY WAS COVERED IN SNOW FOR AT LEAST 3 WEEKS

**NO SOLAR ENERGY GENERATION - STORAGE ON A FULLY RENEWABLE SYSTEM WILL BE CRITICAL
AT PRESENT, STORAGE COSTS ARE EXTREMELY HIGH AND THE STORAGE LIFETIME IS EXTREMELY SHORT**



IN ADDITION TO NOT MEETING ITS GREENHOUSE GAS REDUCTION TARGETS, GERMANY IS NOW A NET IMPORTER OF ELECTRICITY WHILE ALSO HAVING TO OPERATE COAL FIRED GENERATION TO KEEP THE LIGHTS ON

FRANCE, WHICH IS 70% NUCLEAR AND 10% HYDRO IS EXPORTING ENERGY EVEN WHILE 15% OF ITS NUCLEAR CAPACITY WAS OFFLINE FOR MAINTENANCE

FRANCE IS BUILDING MORE REACTORS

France Is Europe's Top Power Exporter as Germany Turns Importer



French nuclear output is a cornerstone for Europe's electricity market. *Photographer: Jose Cendon/Bloomberg*

Bloomberg August 7, 2023

The Conclusions of the Recent Gas Stove Study are Extremely Questionable

The Study States that Use of Gas Stoves Increases the Risk of Childhood Asthma

- **The Study Relied on 30 – 40 Year Old Data and an Analytical Tool Called PAF**
- **PAF is Unreliable when Used in Multivariable Systems with Non-Specific Data (Will Work Well for Analyzing a Single Virus, Less so for Asthma which can have more than seven risk factors)**

BEYOND USING THE INCORRECT TOOL, RESULTS ARE CALLED INTO QUESTION BY THE FOLLOWING FACTS:

- **The Top 10 States for Asthma use 80% Electric Stoves**
- **The Top 8 States for Childhood Asthma use 80% Electric Stoves.**
- **THE STUDY IS SO FLAWED THAT IT SHOULD NOT BE USED TO SET PUBLIC POLICY FOR 19.5 MILLION PEOPLE**
- **OVER TIME, IT WILL ADD OVER \$18 BILLION EXTRA DOLLARS FOR THE STOVES AND AT LEAST \$54 BILLION IN OTHER WIRING COSTS FOR LITTLE TO NO HEALTH IMPROVEMENTS IN THE STATE. THE \$72 BILLION WILL BE SHOULDERED ON THE BACKS OF THE RESIDENTS FOR EQUIPMENT THAT RUNS AN HOUR PER DAY.**
- **THERE IS A BETTER WAY TO ACHIEVE SIMILAR RESULTS THAT WILL REDUCE GAS LEAKAGE AND IMPROVE HEALTH WHILE ELIMINATING \$72 BILLION IN COSTS AND CAN BE ACHIEVED IN A FRACTION OF THE TIME**

Background on PAF

While the Population Attributable Fraction (PAF) provides potentially valuable information regarding the community-level effect of risk factors, significant limitations exist with current strategies for estimating a PAF in multiple risk factor models. These strategies can result in paradoxical or ambiguous measures of effect, or require unrealistic assumptions regarding variables in the model.

FOR A MULTI-VARIABLE ANALYSIS, VERY SPECIFIC DATA IS NEEDED.

A VERY SHORT PHYSICS LESSON

POWER AND ENERGY ARE NOT THE SAME THING

- THE MEDIA IS CONFUSING THEM AND GIVING AN UNKNOWING PUBLIC A FALSE SENSE OF THE CAPABILITIES OF RENEWABLE GENERATION
 - NY TIMES ARTICLE ABOUT ONE VANDERBILT IS A CLASSIC EXAMPLE OF THIS ERROR. STATED THAT THE 1.2 MW COGEN PLANT COULD BE REPLACED BY SIX FOOTBALL FIELD SIZED SOLAR ARRAYS. THE POWER OUTPUT WOULD MATCH EIGHT FOOTBALL FIELDS OF SOLAR ARRAYS BUT THE ENERGY OUTPUT WOULD NEED ABOUT 150 FOOTBALL FIELDS OF SOLAR ARRAYS OCCUPYING AN AREA ABOUT 25% OF CENTRAL PARK JUST FOR ONE BUILDING
 - <https://www.nytimes.com/2023/02/14/climate/green-skyscraper-one-vanderbilt.html>
- POWER IS THE INSTANTANEOUS OUTPUT OR USAGE OF ANY ELECTRIC DEVICE OR GENERATOR
(EXAMPLE: KILOWATTS or KW) 40 Watt Lightbulb 40 Watts is the Power rating of the Light Bulb
- ENERGY IS THE AMOUNT OF ELECTRICITY GENERATED OR USED OVER TIME (EXAMPLE: KILOWATT HOURS or KWh)
A 40 Watt Lightbulb Left on For 25 Hours will use 1 Kilowatt Hour of Energy
- 20 GIGAWATTS (20 BILLION WATTS) OF SOLAR ARRAYS IN NY STATE COVERING APPROXIMATELY 200 SQUARE MILES WILL HAVE THE SAME ENERGY OUTPUT AS A 3 GIGAWATT FOSSIL FUEL OR NUCLEAR PLANT COVERING 3 SQUARE MILES.
- A typical 1,000-megawatt nuclear facility in the United States needs a little more than 1 square mile to operate. NEI says wind farms require 360 times more land area to produce the same amount of electricity and solar photovoltaic plants require 75 times more space.
 - COPIED FROM AN NEI ANALYSIS
- WHILE THE FOSSIL FUEL OR NUCLEAR PLANT WILL MAINTAIN THE SAME OUTPUT FOR 70 YEARS, THE SOLAR ARRAYS WILL LOSE 1% PER YEAR AND NEED TO BE REPLACED AFTER 25 YEARS
- THE UTILITY SYSTEM RUNS ON ENERGY OVER THE COURSE OF A YEAR – POWER WILL DETERMINE THE PEAK LOAD THAT CAN BE HANDLED

UNITS OF MEASURE

POWER (PEAK POWER USAGE SHOWS UP IN THE DEMAND CHARGE ON A COMMERCIAL UTILITY BILL)

- **1 Kilowatt (KW) = 1000 watts**
- **1 Megawatt (MW) = 1000 KW**
- **1 Gigawatt (GW) = 1000 MW**
- **1 Terawatt (TW) = 1000 GW**

ENERGY

- **1 Kilowatt-Hour (KWh) = 1000 Watts used or generated for 1 Hour**
- **1 Megawatt-Hour (MWh) = 1000 KWh**
- **1 Gigawatt-Hour (GWh) = 1000 MWh**
- **1 Terawatt-Hour (TWh) = 1000 GWh**

WHAT IS CAPACITY FACTOR (CF) ?

CAPACITY FACTOR IS THE AVERAGE AMOUNT OF TIME PER YEAR THAT A GENERATION RESOURCE WILL OPERATE

FOR FOSSIL FUEL AND NUCLEAR PLANTS CF=0.8 – 0.9 (80% - 90%)

FOR OFFSHORE WIND IN NY STATE CF=0.46 (46%)

FOR LAND BASED WIND CF=0.25 – 0.3 (25% - 30%)

FOR SOLAR (FIXED ARRAY) CF=0.12 - 0.13 (12% - 13%)

TO CALCULATE THE ENERGY OUTPUT OF A GENERATION RESOURCE IN MWh,

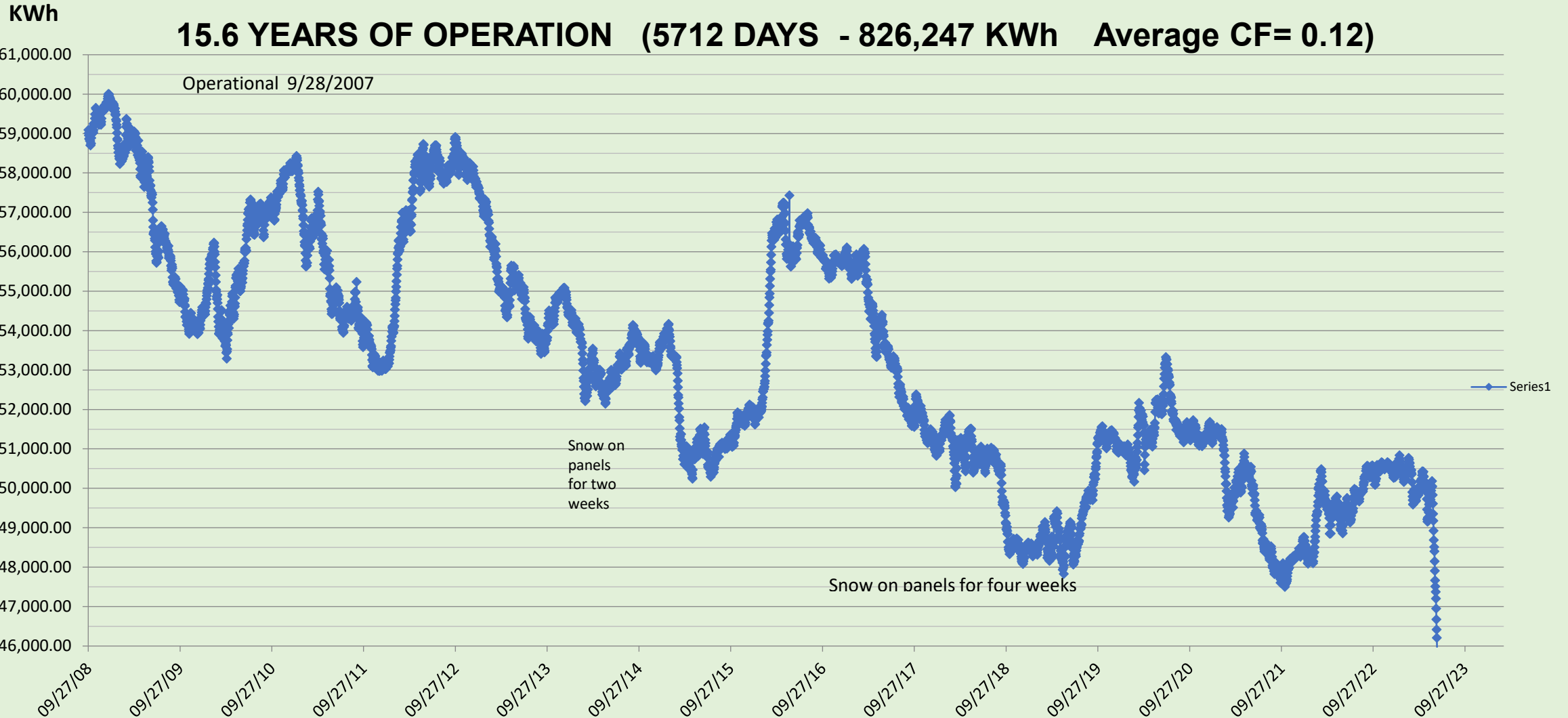
MULTIPLY THE CAPACITY OF THE GENERATOR IN MW x 365 DAYS x 24 HOURS x CF = MWh / YEAR

A 1.2 MW COGENERATION SYSTEM WILL GENERATE SEVEN TIMES AS MUCH ELECTRICAL ENERGY AS A 1.2 MW SOLAR ARRAY, PLUS THE COGENERATION WILL PROVIDE THERMAL ENERGY.

IN ITS LAST FULL YEAR OF OPERATION, INDIAN POINT GENERATED 16.3 TWh with a CF =0.93

365 Day Total KWh Output - 50 KW Array @ 64 Drake Avenue

OUTPUT IS DECAYING AT APPROXIMATELY 1% PER YEAR

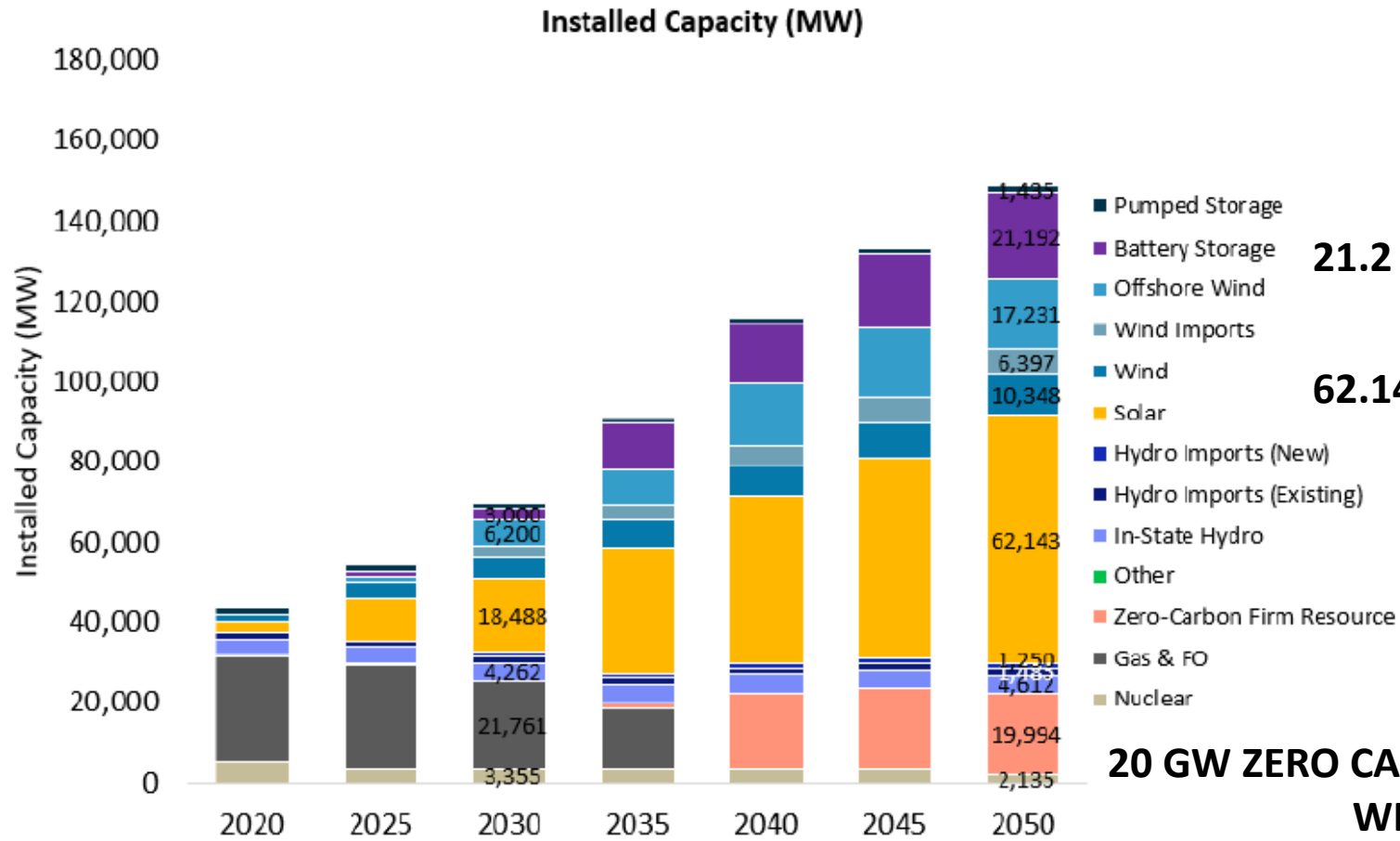


THE
CLCPA
FANTASY

CLCPA APPENDIX G - Power

SHOWS 18.5 GW OF INSTALLED SOLAR ARRAYS BY 2030. AT PRESENT INSTALLATION RATES, THEY WILL BE LUCKY TO ACHIEVE 13 GW BY 2035

Figure 29. Installed Capacity and Annual Generation for Scenario 3: Accelerated Transition away from Combustion³⁴

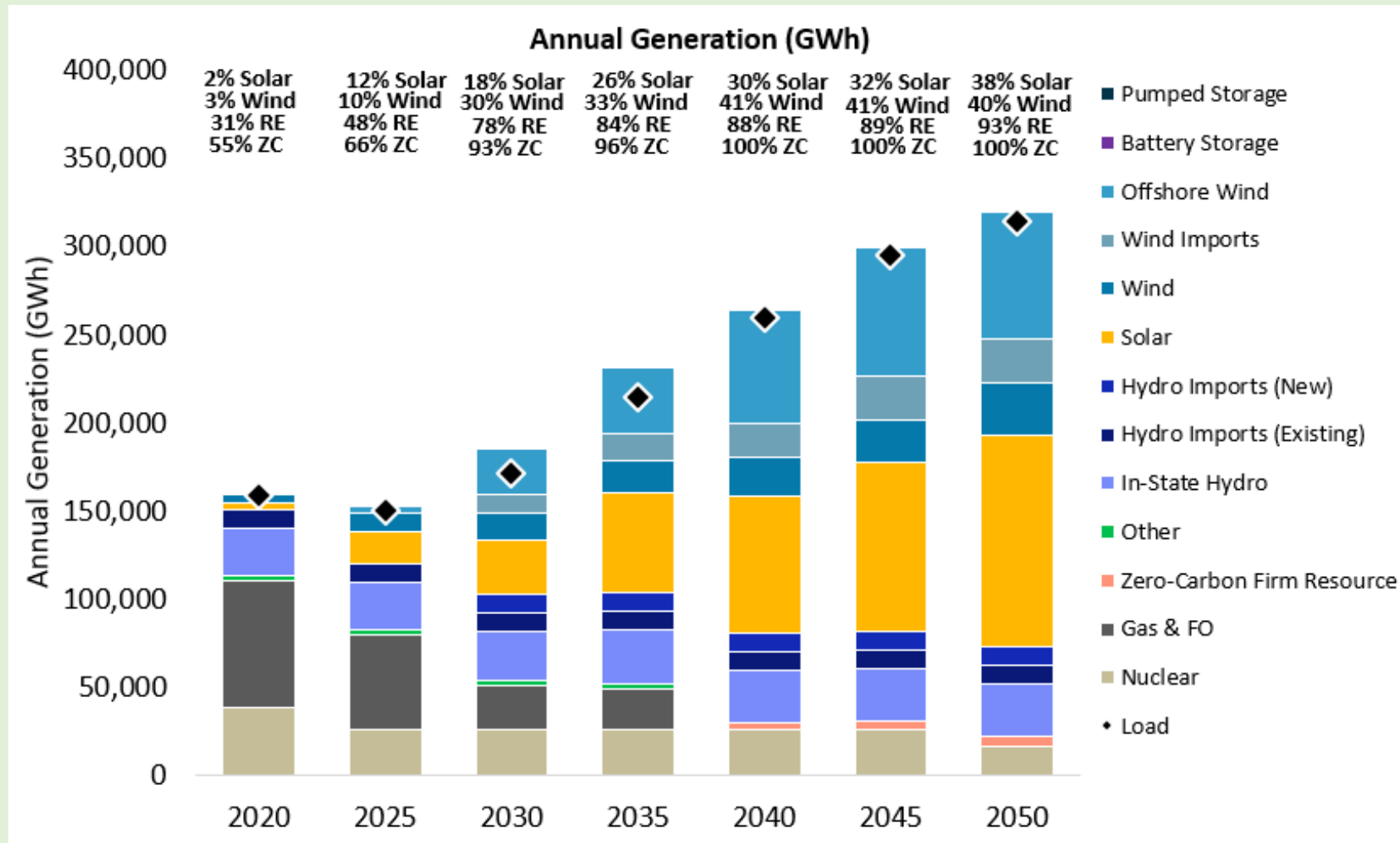


21.2 GW BATTERY STORAGE

62.143 GW SOLAR

**20 GW ZERO CARBON FIRM RESOURCE
WHAT IS IT ?**

CLCPA APPENDIX G - Energy



**SHOWS
320,000 GWh
OF ENERGY
PRODUCTION
THAT IS 38%
SOLAR IN 2050**

121,600 GWh

**EVEN IF THEY COULD MIRACULOUSLY FIGURE OUT HOW TO INSTALL EVERYTHING,
THE PLAN IS 100,000 GWh SHORT OF THE 430,000 GWh THAT WILL BE NEEDED FOR FULL ELECTRIFICATION BY 2050
AND AS WILL BE SHOWN, THE 320,000 GWh SHOWN IS EXTREMELY OVER ESTIMATED**

CLCPA AND STATE DOCUMENTS ARE USING UNREALISTIC ENERGY ESTIMATES

COPIED FROM NYS SOLAR BLOCK INCENTIVE ESTIMATOR – SHOWS SOLAR CAPACITY FACTORS FROM 13.4% - 17.5%

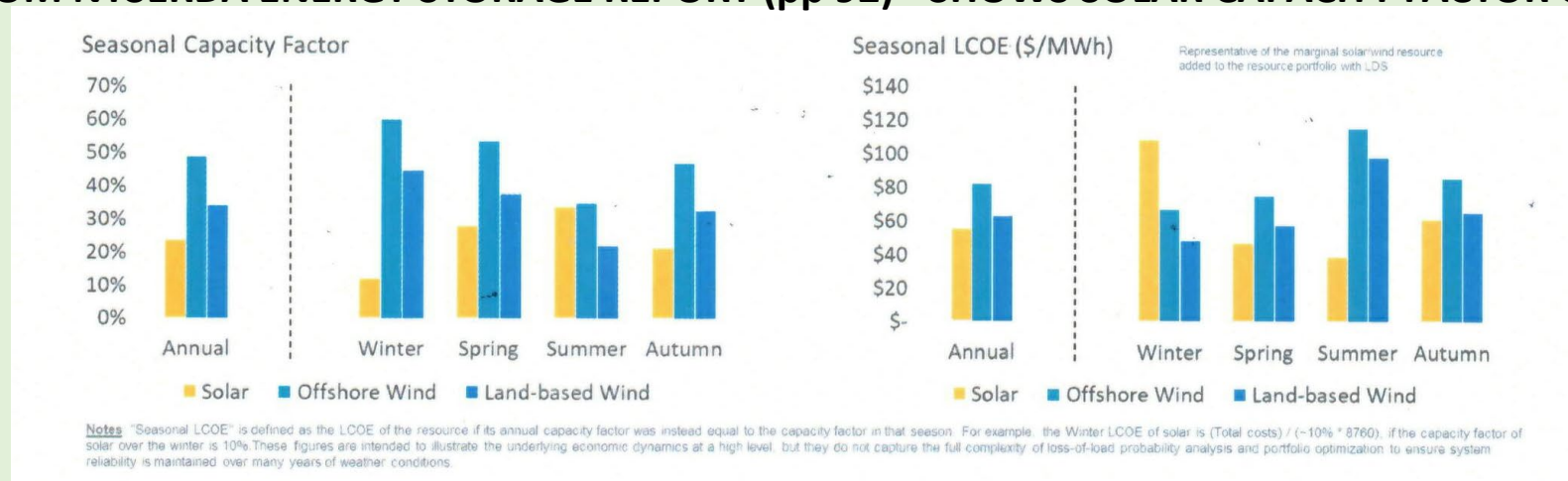
$$\$_{MAX} = \left(PBI \frac{\$}{kWh} \right) \times (System\ Size\ KW_{DC}) \times (Capacity\ Factor) \times \left(8,760 \frac{hours}{year} \right) \times (3\ Y)$$

- Fixed mount systems use 13.4% capacity factor
- Single-axis tracking systems use 16.0% capacity factor
- Dual-axis tracking systems use 17.5% capacity factor
- If the project qualifies for a strategic location incentive, multiple $\$_{MAX}$ by 1

<https://ny-Sun.ny.gov/>

FIXED ARRAYS WILL HAVE A CAPACITY FACTOR (CF) OF APPROXIMATELY 13% WHEN NEW AND WILL DROP TO 10% TO 11% AFTER AGING

COPIED FROM NYSDERDA ENERGY STORAGE REPORT (pp 92) - SHOWS SOLAR CAPACITY FACTOR OF 22%



AVERAGE CF OVER THE LIFE OF THE ARRAY = 11.5%

THE CF=22% HAS SHOWN UP IN SEVERAL DOCUMENTS

CLCPA AND STATE DOCUMENTS ARE USING INCORRECT ENERGY ESTIMATES

- **PREVIOUS SLIDES SHOW 62.143 GW of SOLAR ARRAYS AND 38% SOLAR OF 320,000 GWh = 121,600 GWh OF SOLAR ENERGY PER YEAR IN 2050**
- **TO ACHIEVE THAT MUCH SOLAR ENERGY USING 62.1 GW OF SOLAR WOULD REQUIRE A SOLAR CAPACITY FACTOR OF 0.2235**

$$62.143 \text{ GW} \times 365 \text{ DAYS} \times 24 \text{ HOURS} \times 0.2235 \text{ CF} = 121,600 \text{ GWh}$$

**USING THE CORRECT SOLAR CAPACITY FACTOR OF 0.13 YIELDS 70,768 GWh
51,000 GWh LESS.**

SOLAR ENERGY OUTPUT IS BEING OVERESTIMATED IN THE CLCPA BY 72%

CLCPA GENERATION PLAN – APPENDIX G

3.3 Sectoral Results

Buildings

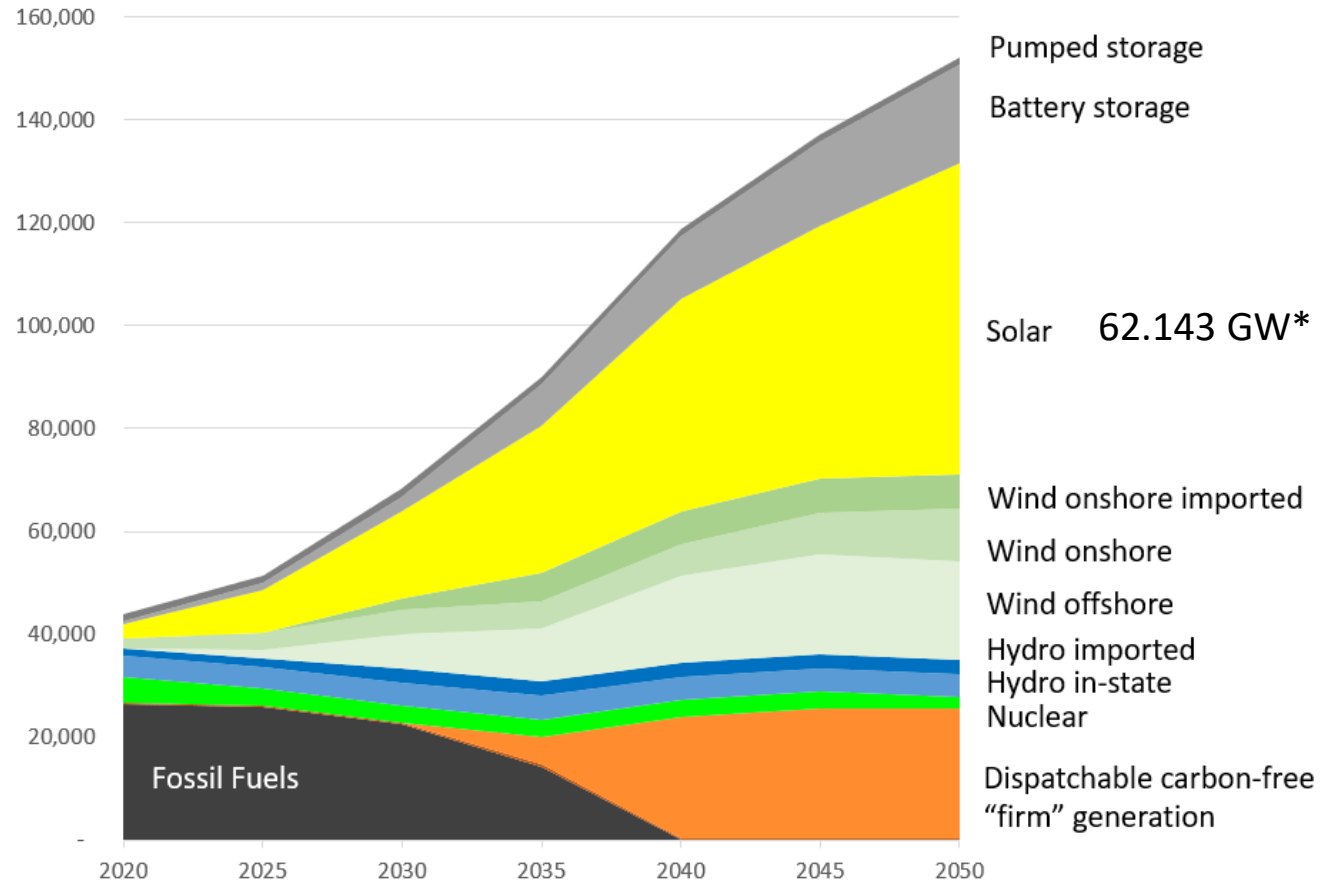
Direct emissions in the buildings sector are dominated by emissions from space and water heaters (note that indirect emissions associated with electricity generated to power electric appliances are captured under electricity generation). Although population and households are expected to grow in New York, all scenarios see a significant decline in building sector emissions through energy efficiency, rapid electrification, and improved building shells.

SHOWS ALL FOSSIL FUEL GENERATION ENDING BY 2040 BEING REPLACED BY RENEWABLE SOURCES

AS WILL BE SHOWN IN LATER SLIDES, THE ASSUMPTIONS THAT THIS GRAPH ARE BASED UPON ARE A FANTASY

WHAT IS THE SOURCE OF 20 GW OF DISPATCHABLE CARBON FREE GENERATION?

CLCPA NYSERDA Scenario 3 Electricity Generation Capacity (MW)



Courtesy: Keith Schue - Nuclear NY

62.143 GW OF SOLAR WILL OCCUPY BETWEEN 450 – 600 SQUARE MILES OF FARMLAND

CLCPA GENERATION PLAN – APPENDIX G

THE FOLLOWING STATEMENT IS USED AS A JUSTIFICATION FOR THE
MONETARY BENEFITS OF GHG REDUCTION

Value of Avoided GHG Emissions and Health Co-Benefits

Reducing GHG emissions in line with Climate Act emissions limits avoids economic impacts of damages caused by climate change equaling approximately \$240 to \$255 billion. Improved health outcomes, including improvements in air quality, increased active transportation, and energy efficiency interventions in low- and moderate-income homes generate additional benefits ranging from \$155 to 160 billion. As shown in Figure 46, collective benefits range from \$400 to \$415 billion over the next 30 years.

THE CLCPA IS WRITTEN AS THOUGH NY STATE IS OPERATING IN A VACUUM

NY STATE'S TOTAL GHG EMISSIONS ARE 350 MILLION METRIC TONS (MT) ANNUALLY
(160 MILLION METRIC TONS ARE FROM OUT OF STATE – MOST FROM FOSSIL FUEL EXTRACTION)

OVER THE PAST TWO YEARS INCREASED WORLDWIDE GHG EMISSIONS FROM CHINA, INDIA, AND OTHER COUNTRIES WAS 2.5 BILLION METRIC TONS - 7 TIMES AS MUCH 40% OF THAT WAS FROM INCREASED COAL COMBUSTION

**NY STATE COULD STOP USING FOSSIL FUELS ENTIRELY AND THE 160 MILLION MT OF OUT OF STATE EMISSIONS WILL STILL BE THERE
NY STATE COULD ELIMINATE 100% OF ITS GHG EMISSIONS AND NOT AFFECT DAMAGES CAUSED BY CLIMATE CHANGE
HOWEVER, REDUCING VEHICLE EMISSIONS AND IMPROVING GENERATING PLANT COMBUSTION EFFICIENCY WILL HAVE A POSITIVE HEALTH IMPACT**

A Recent Study Released by Cornell University** Confirms What Has Been Presented to NY State for the Past Four Years

- *The report says that there is going to be between a 59% and 89% energy shortfall in Zones J and K if the CLCPA is implemented as planned. Zone J is NY City and Lower Westchester (The Con Ed service Area) and Zone K is Long Island. That is over 60% of the population of NY State.*
- *It also says that the 20 GW of Non Carbon dispatchable generation in the CLCPA is not enough. They will need 37 GW of Dispatchable Generation to fill the gaps. Keep in mind that is almost as much generation as NY State has in total, at the moment. Much of that existing generation is from fossil fuels that will have to be shuttered under the CLCPA.*
- *It also says that Hydrogen Storage will be helpful to use the excess renewable generation that will exist upstate so that it won't have to be curtailed because they will not have nearly enough transmission capacity to send it where it is needed. Again, many proponents of the CLCPA are anti-hydrogen.*
- *Finally, it is important to note that load shedding is almost always associated with nearby transmission line congestion that limits the effective use of available renewable resources. Therefore, increasing wind, solar, and battery capacity or decreasing electrification rates cannot fully compensate for the shortages caused by temperature increases (during summer). This supports the assertion that analyses of decarbonization strategies that neglect spatiotemporal co-variability and operational constraints are prone to underestimating system vulnerability.*

** Heterogeneous Vulnerability of Zero-Carbon Power Grids under Climate-Technological Changes

M. Vivienne Liu^{1*}, Vivek Srikrishnan², Kenji Doering², Elnaz Kabir³, Scott Steinschneider², C. Lindsay Anderson^{1,2}

¹*Systems Engineering, Cornell University, Ithaca, 14853, NY, USA. ² Department of Biological and Environmental Engineering, Cornell University, Ithaca, 14853, NY, USA. ³ Department of Engineering Technology & Industrial Distribution, Texas A&M University, College Station, 77843, TX, USA.

REALITY

THE FOLLOWING NY STATE ENERGY CHART IS DIVIDED INTO FOUR COLUMNS

ALL VALUES ARE IN GIGAWATT-HOURS (ENERGY)

- **A – EXISTING NY STATE FOSSIL FUEL USAGE AFTER THE CLOSURE OF INDIAN POINT NUCLEAR. IT INCLUDES ENERGY USED FOR ELECTRIC GENERATION (BLUE), ONSITE GAS COMBUSTION (YELLOW), ONSITE OIL COMBUSTION (GRAY), TRANSPORTATION GASOLINE (YELLOW), TRANSPORTATION DIESEL FUEL (BLUE) AND ENERGY LOST UP THE CHIMNEY OR AS HEAT AT THE GENERATING PLANTS (GREEN)**
- **B - THE ENERGY USAGE OF THE SYSTEM IF IT WAS FULLY CONVERTED TO ELECTRIC SYSTEMS – HEAT PUMPS AND EV's**
- **C - THE AMOUNT OF STORAGE THAT WILL BE INSTALLED BY 2040 ACCORDING TO THE RECENTLY RELEASED NYSERDA NY STATE ENERGY ROADMAP**
- **D – THE AMOUNT OF NEW RENEWABLE GENERATION THAT WILL BE INSTALLED BY 2035. KEEP IN MIND THAT THE STATE IS FALLING WELL BEHIND THIS SCHEDULE BECAUSE OF COSTS AND INTERCONNECTION DIFFICULTIES, AS I TOLD THEM WOULD OCCUR IN MARCH,2019.**

NYSERDA AND THE PSC DID NOT DISAGREE WITH MY ANALYSIS FOUR YEARS AGO BUT SAID THAT THEY WOULD INSTALL RENEWABLES FASTER THAN I WAS CALCULATING BUT I WAS USING THEIR INSTALLATION RATES. THEIR INITIAL SCHEDULE WOULD NOT HAVE WORKED LET ALONE THE CURRENT DELAYED ONE.

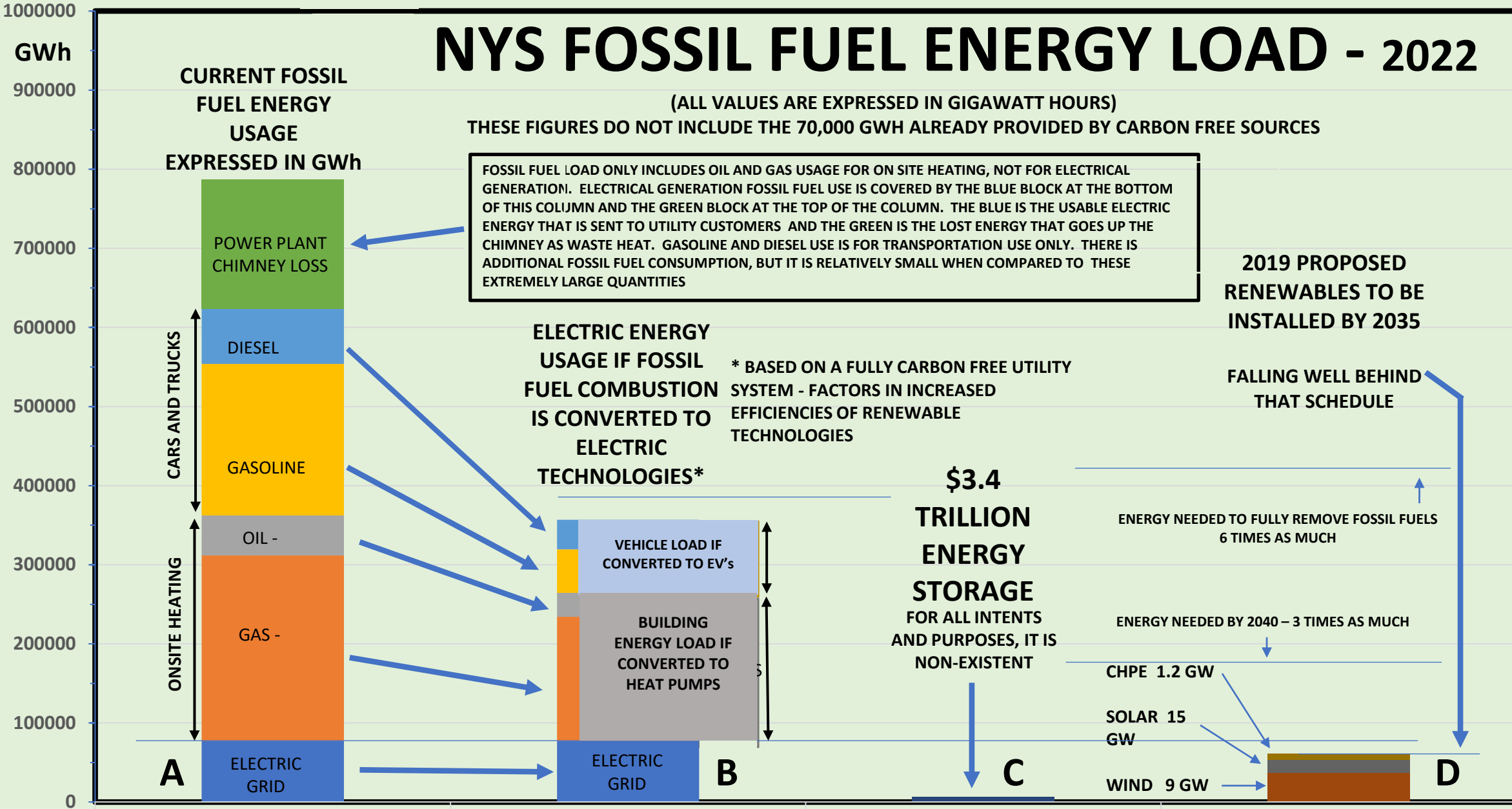
WHAT THE PUBLIC DOES NOT UNDERSTAND IS THE ENORMOUS AMOUNT OF ENERGY DELIVERED BY THE GAS PIPELINES THAT IS ACTUALLY USED WITH AN EFFICIENCY OVER 80% TO 95% DURING ONSITE COMBUSTION SO REPLACING IT WILL REQUIRE STAGGERING AMOUNTS OF ELECTRICAL GENERATION. POWER PLANT EFFICIENCIES ARE IN THE RANGE OF 33% - 60% WITH 7% OF THAT ENERGY LOST ON TRANSMISSION LINES DELIVERING IT TO THE END USER.

NYS FOSSIL FUEL ENERGY LOAD - 2022

(ALL VALUES ARE EXPRESSED IN GIGAWATT HOURS)

THESE FIGURES DO NOT INCLUDE THE 70,000 GWH ALREADY PROVIDED BY CARBON FREE SOURCES

FOSSIL FUEL LOAD ONLY INCLUDES OIL AND GAS USAGE FOR ON SITE HEATING, NOT FOR ELECTRICAL GENERATION. ELECTRICAL GENERATION FOSSIL FUEL USE IS COVERED BY THE BLUE BLOCK AT THE BOTTOM OF THIS COLUMN AND THE GREEN BLOCK AT THE TOP OF THE COLUMN. THE BLUE IS THE USABLE ELECTRIC ENERGY THAT IS SENT TO UTILITY CUSTOMERS AND THE GREEN IS THE LOST ENERGY THAT GOES UP THE CHIMNEY AS WASTE HEAT. GASOLINE AND DIESEL USE IS FOR TRANSPORTATION USE ONLY. THERE IS ADDITIONAL FOSSIL FUEL CONSUMPTION, BUT IT IS RELATIVELY SMALL WHEN COMPARED TO THESE EXTREMELY LARGE QUANTITIES



Fossil Fuel Load (Raw Values 2022)** Energy Load Adjusted For Renewables Storage (2040) New Renewable Generation (2035)

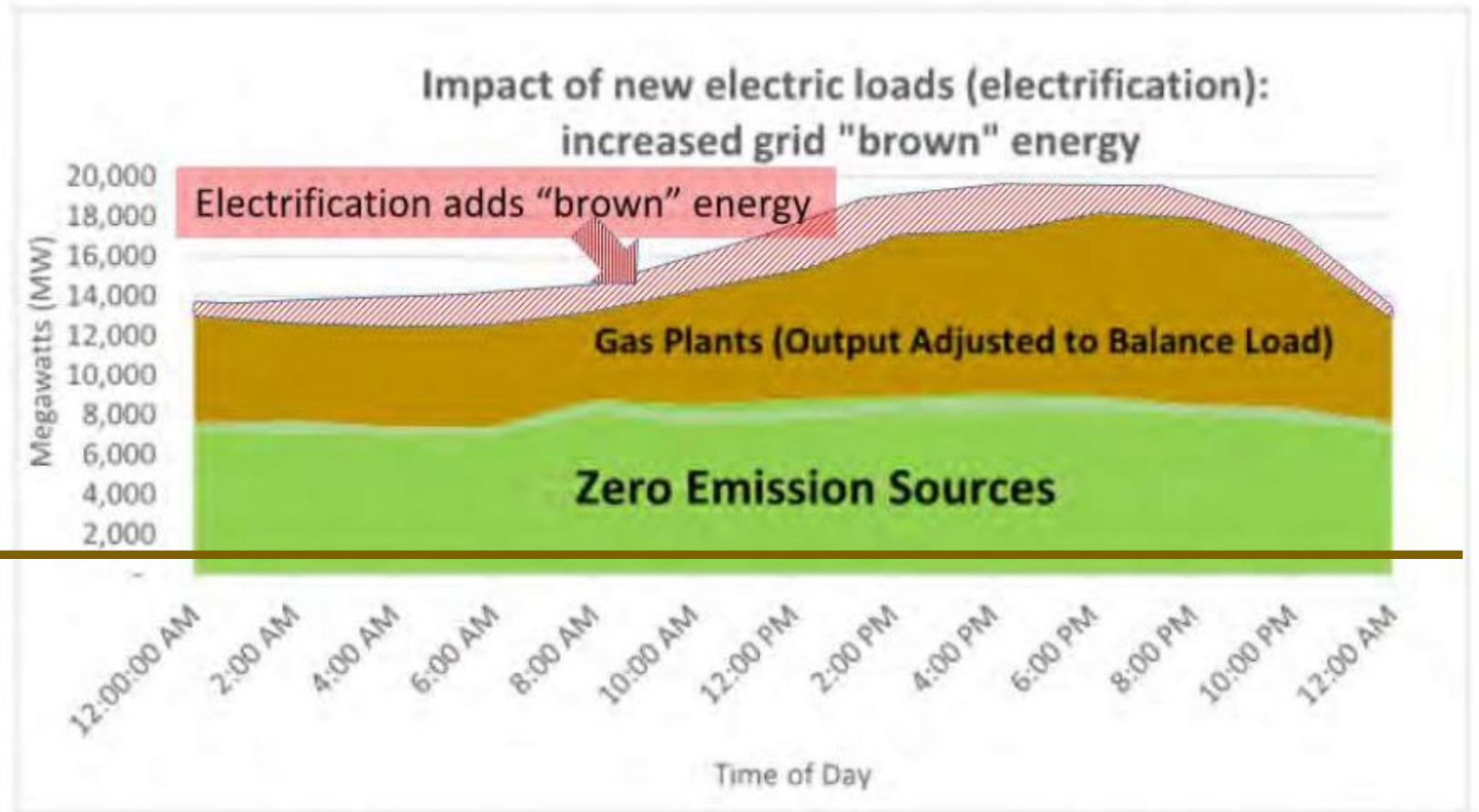
ON NY STATE'S UTILITY SYSTEM, BUILDING ELECTRIFICATION WILL INCREASE BROWN ENERGY (FOSSIL FUEL GENERATION)

Figure 5c: New loads from electrification are directly balanced by more natural gas electric power generation.

GRAPH IS FOR NY STATE DURING THE SHOULDER MONTHS AND SHOWS THAT EVEN DURING TIMES OF LOW LOAD, ALL ADDITIONAL LOADS ARE SUPPORTED BY FOSSIL FUEL COMBUSTION

AS LOADS INCREASE, THE NEXT BEST FOSSIL FUEL GENERATION WILL BE ACTIVATED, HOWEVER IN TIMES OF HIGH LOAD DURING COLD PERIODS THE HEAT PUMPS WILL BE SUPPORTED BY THE LEAST EFFICIENT FOSSIL FUEL GENERATION AND WILL OPERATE AT A SYSTEM WIDE EFFICIENCY BELOW 60%, WHEREAS ONSITE FOSSIL FUEL COMBUSTION HAS EFFICIENCIES OVER 80%

IN THE DOWNSTATE REGION, ALL LOADS ABOVE THE BROWN LINE ARE SUPPORTED BY FOSSIL FUEL GENERATION



Steve Beyers¹, Koenraad Beckers², and Jefferson Tester¹

¹ Cornell University, Ithaca NY

² National Renewable Energy Laboratory, Golden CO

TO REDUCE CARBON FOOTPRINT

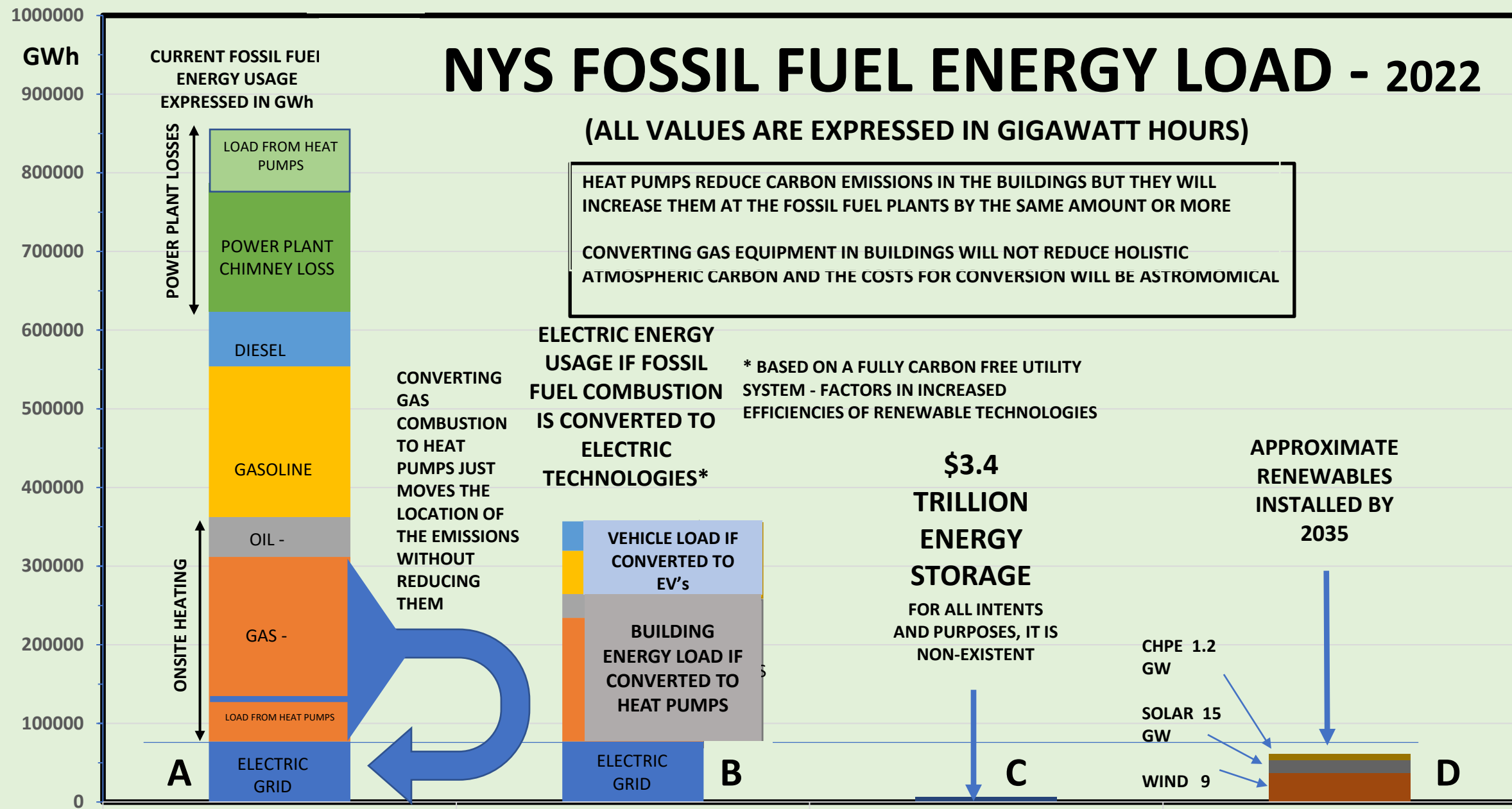
- **WE NEED TO DECREASE COLUMN A AND INCREASE COLUMN D**
- **ANY ELECTRIFICATION HAS TO DECREASE COLUMN A MORE THAN IT INCREASES IT**
- **WITH LIMITED RESOURCES, ANY TECHNOLOGIES THAT DON'T PROVIDE A LARGE DECREASE IN COLUMN A SHOULD BE LEFT FOR A LATER DATE**
- **UTILITY CUSTOMERS ARE ALREADY REBELLING AGAINST HIGH COSTS
ALL UTILITY IMPROVEMENTS END UP BEING PAID BY RATEPAYERS
AND IF THE PUBLIC DOESN'T SUPPORT IT, THE PROJECT WILL FAIL -
SEE ONTARIO CANADA — PASSED "GREEN" LEGISLATION IN 2009 AND REPEALED IT IN 2019**

NYS FOSSIL FUEL ENERGY LOAD - 2022

(ALL VALUES ARE EXPRESSED IN GIGAWATT HOURS)

HEAT PUMPS REDUCE CARBON EMISSIONS IN THE BUILDINGS BUT THEY WILL INCREASE THEM AT THE FOSSIL FUEL PLANTS BY THE SAME AMOUNT OR MORE

CONVERTING GAS EQUIPMENT IN BUILDINGS WILL NOT REDUCE HOLISTIC ATMOSPHERIC CARBON AND THE COSTS FOR CONVERSION WILL BE ASTROMOMICAL



Fossil Fuel Load (Raw Values 2022)**

Energy Load Adjusted For Renewables

Storage (2040)
(6 GW x 1000 Hours)

New Renewable Generation (2035)

CHPE 1.2 GW
SOLAR 15 GW
WIND 9

\$3.4 TRILLION ENERGY STORAGE
FOR ALL INTENTS AND PURPOSES, IT IS NON-EXISTENT

* BASED ON A FULLY CARBON FREE UTILITY SYSTEM - FACTORS IN INCREASED EFFICIENCIES OF RENEWABLE TECHNOLOGIES

ELECTRIC ENERGY USAGE IF FOSSIL FUEL COMBUSTION IS CONVERTED TO ELECTRIC TECHNOLOGIES*

CONVERTING GAS COMBUSTION TO HEAT PUMPS JUST MOVES THE LOCATION OF THE EMISSIONS WITHOUT REDUCING THEM

CURRENT FOSSIL FUEL ENERGY USAGE EXPRESSED IN GWh

POWER PLANT LOSSES

ON-SITE HEATING

A

B

C

D

**HIGHER UTILITY COSTS CAN BE
JUSTIFIED IF THEY ARE
ASSOCIATED WITH SIGNIFICANT
CLIMATE BENEFITS THAT HELP
TO RECOUP THE COSTS**

**WITH NY STATE'S PLAN, THAT
DOES NOT OCCUR**

CUSTOMER UTILITY COSTS ARE RISING

THE PSC HAS RECENTLY APPROVED LARGE DELIVERY COST INCREASES

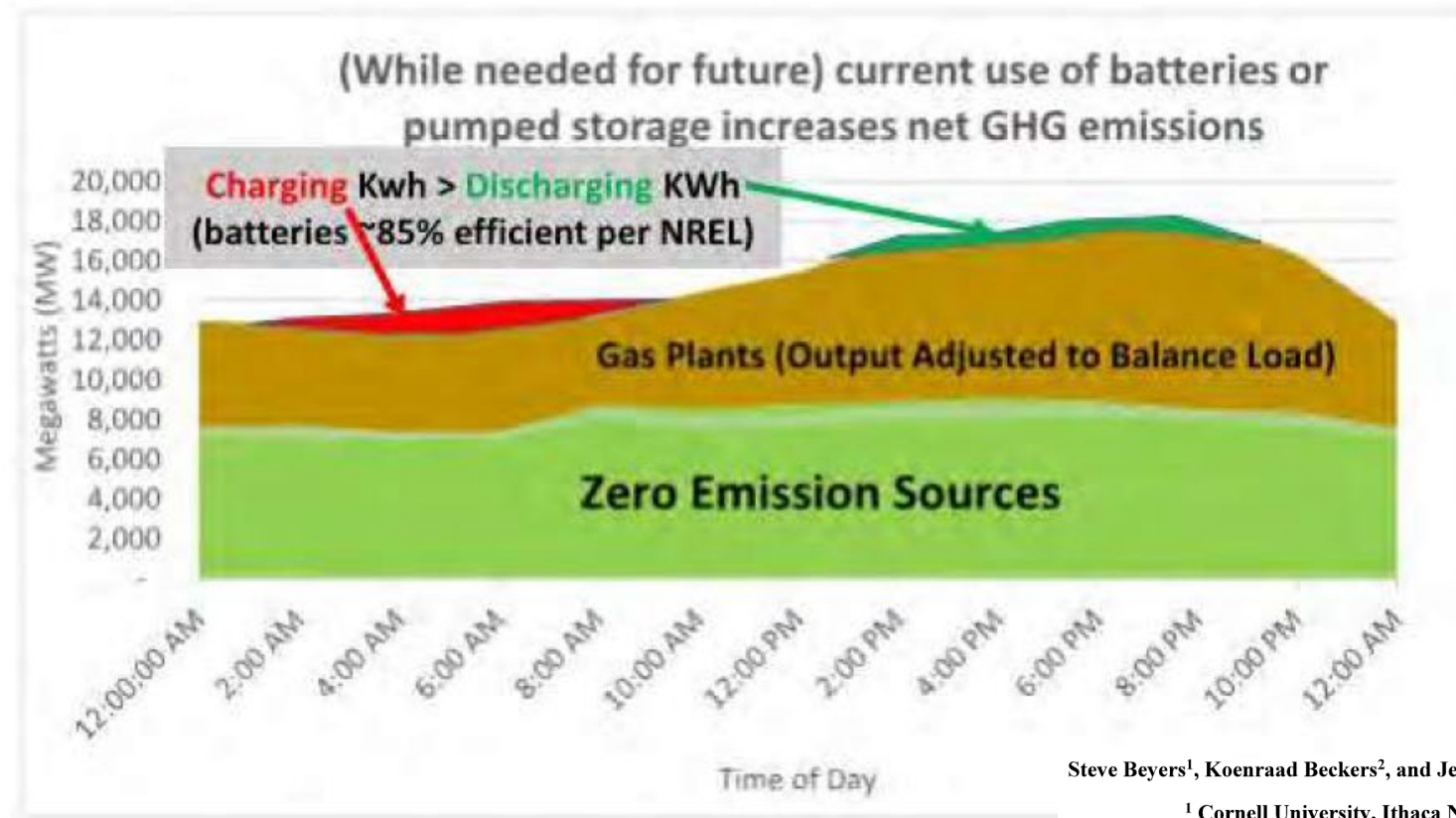
- **Rochester Gas & Electric >22% over 3 years**
- **NYSEG 31% over 3 years**
- **Con Ed 15% over 3 years**
- **Central Hudson is looking for similar increases.**

- See the following links.
- <https://www.utilitydive.com/news/new-york-psc-approves-big-rate-increases-avangrid-utilities/696523/>
- <https://nysfocus.com/2023/08/07/energy-bill-rate-hikes-psc-coned>
- <https://spectrumlocalnews.com/nys/central-ny/news/2023/10/13/big-turnout-sought-for-kingston-hearing-on-electric-rate-hike->

SUPPLY COSTS ARE ALSO LIKELY TO RISE

- THE PUBLIC SERVICE COMMISSION RECENTLY DENIED REQUESTS FROM OFFSHORE WIND (OSW) INSTALLERS FOR \$12 BILLION IN INFLATIONARY INCREASES FOR THE NY STATE PROJECTS. THEY WILL NOW NEED TO BE REBID IF THE OFFSHORE WIND COMPANIES CANCEL THEIR CONTRACTS
- A RECENT OFFSHORE LEASE BIDDING PROCESS IN THE UNITED KINGDOM PRODUCED NO BIDDERS BECAUSE OF A LOW CEILING (MAXIMUM PRICE)
- THE OSW FIRMS SAID THAT THEY NEEDED AT LEAST \$75/MWh IN ORDER TO BID
- A RECENT ARTICLE IN BLOOMBERG LISTED THE U.S. WHOLESALE OFFSHORE WIND PRICE AT \$114/MWh. <https://www.bloomberg.com/news/articles/2023-10-18/biden-s-2030-offshore-wind-goal-looks-like-it-simply-won-t-happen>
- THAT IS 169% HIGHER THAN THE CURRENT WHOLESALE PRICE OF ELECTRICITY IN NY STATE (\$43.50/MWh)
- BECAUSE OF THE JONES ACT, INSTALLATION COSTS ARE HIGHER IN THE U.S
- AS A REFERENCE, COMBINED CYCLE NATURAL GAS GENERATION COSTS APPROXIMATELY \$50/MWh

UTILITY BATTERIES (Li-ion) CHARGED ON NY STATE'S ELECTRICAL SYSTEM WILL INCREASE CO₂e EMISSIONS 15% - 20% RELATED TO THAT ENERGY



Steve Beyers¹, Koenraad Beckers², and Jefferson Tester¹

¹ Cornell University, Ithaca NY

² National Renewable Energy Laboratory, Golden CO

Figure 5d: Battery (or pumped) storage. Batteries and other load-shifting technologies shift the times of natural gas power production, smoothing the grid and reducing the need for excess capacity – but for a grid balanced with natural gas, may marginally increase overall emissions (since more power is needed to charge batteries than is returned).

EV's - MANDATED AFTER 2035

NO INTERNAL COMBUSTION ENGINE (ICE) VEHICLES CAN BE SOLD IN NY STATE AFTER 2035

SEVERAL MAJOR AUTO MANUFACTURERS HAVE SAID THAT THEY WILL NOT BE MAKING ICE VEHICLES AFTER THAT DATE

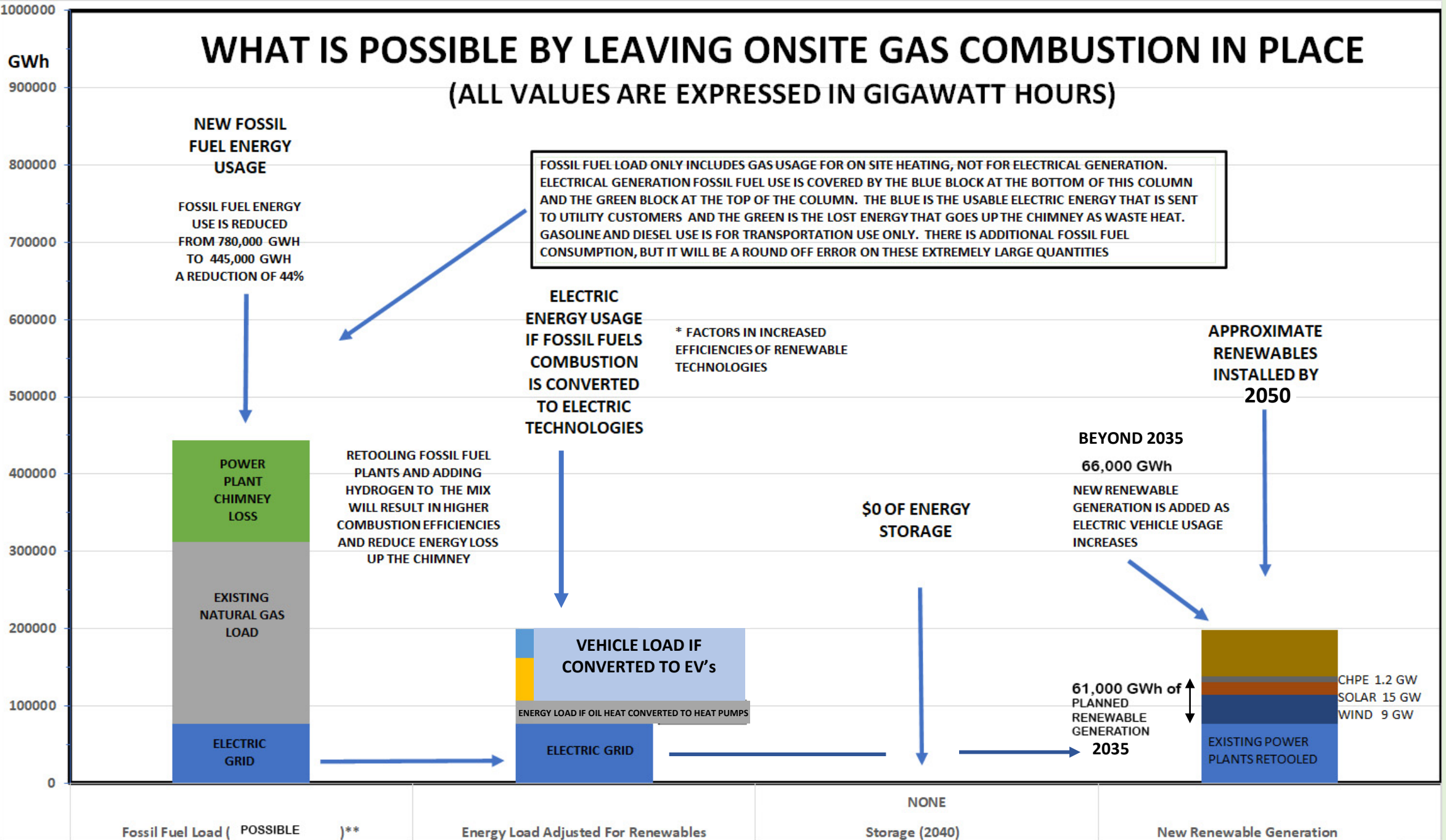
INTERNAL COMBUSTION ENGINES ARE ONLY 22% EFFICIENT

- **AT PRESENT Most Americans (57%) Wouldn't Buy An Electric Vehicle**
- **77% Cite a Lack of Chargers**
- **73% Cite Driving Range**
- **70% Cite Vehicle Cost**

- **104 GAS PUMPS PER 1000 MILES OF ROAD IN THE US COMPARED WITH 22 EV CHARGERS. ** NY STATE HAS 32 EV CHARGERS PER 1000 MILES ***
- *** <https://www.nyserda.ny.gov/All-Programs/Drive-Clean-Rebate-For-Electric-Cars-Program/Charging-Options/Electric-Vehicle-Station-Locator#/analyze?region=US-NY&fuel>**
- **AS EV's TAKE LONGER TO "FILL UP" THEY WILL NEED MORE THAN 104 CHARGERS PER 1000 MILES**
- **FIXING THIS SHORTFALL IS GOING TO REQUIRE A MASSIVE INFRASTRUCTURE INVESTMENT IN CHARGERS, TRANSMISSION CAPABILITY AND GENERATION**

** <https://oilprice.com/Latest-Energy-News/World-News/Most-Americans-Wouldnt-Buy-An-Electric-Vehicle.html>

WHAT IS POSSIBLE BY LEAVING ONSITE GAS COMBUSTION IN PLACE (ALL VALUES ARE EXPRESSED IN GIGAWATT HOURS)



USING CONTROLLED ENVIRONMENT AGRICULTURE TO MITIGATE CARBON EMISSIONS FROM FOSSIL FUEL PLANTS

- **Lengthens the growing season in NY State**
- **Makes Combined cycle Natural Gas plants non emitting.**
- **Increases food output while mitigating the effects of climate change on crop growth. Necessary in light of Food Shortages and Food Inflation**
- **Recovers Water used in the Generating Process**
- **Will Use Large Lateral Greenhouses Designed to Minimize the Amount of Artificial Lighting and Reduce Energy Usage**
- **Climate change is pushing American farmers to confront what's next** (Washington Post November 10, 2023)
https://www.washingtonpost.com/business/interactive/2023/american-agriculture-farming-climate-change/?itid=hp_only-from-the-post_p003_f001

<https://cea.cals.cornell.edu/>

<https://apnews.com/article/indoor-farming-vertical-plenty-kroger-aerofarms-28d360b3c8d7fa424892e23fe1c85c93>

NY STATE POLICY IS CREATING A SITUATION WHERE OLDER POLLUTING GENERATING PLANTS ARE BEING LEFT OPERATING

THE ILLUSION IS THAT THEY WILL BE REPLACED WITH RENEWABLE GENERATION EXCEPT THE STATE DOES NOT HAVE SUFFICIENT RESOURCES TO REPLACE ALL OF THE ENERGY SO THEY WILL STAY OPEN FOR DECADES

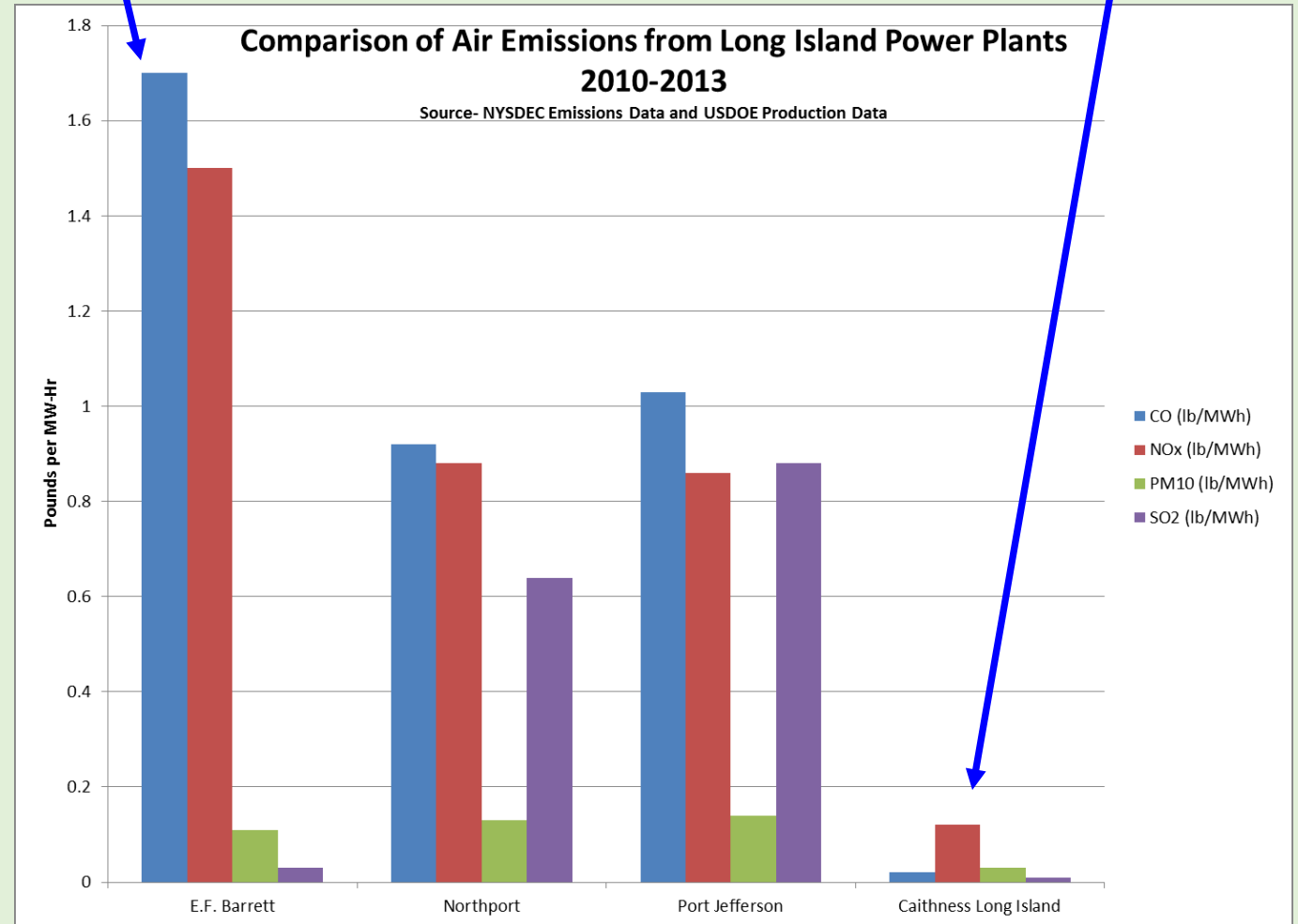
JUST RECENTLY, THE NYISO STATED THAT THEY CANNOT CLOSE THE DIRTY PEAKER PLANTS IN 2025 AS WAS ORIGINALLY MANDATED JUST A FEW YEARS AGO

In sharp contrast, the approximately 350 MW Caithness Long Island plant, which went into commercial operation in 2009, has much lower emissions

SEE SLIDE 79 FOR DATA

THE FALSE PROMISE OF OVERLY ABUNDANT ZERO CARBON RENEWABLE ARE RESULTING IN PLANTS LIKE THIS STAYING OPEN

WHAT CAN BE ACHIEVED QUICKLY WITH RETOOLING OF OLDER GENERATING PLANTS



INSTEAD OF UPGRADING OLDER FOSSIL FUEL PLANTS, NY STATE'S POLICY IS LEAVING DIRTY PLANTS OPEN LONGER.

THE ILLUSION THAT RENEWABLES ARE GOING TO BE INSTALLED RAPIDLY AND ARE GOING TO BE SUFFICIENT TO OPERATE THE ENTIRE SYSTEM IS RUNNING HEADLONG INTO ENERGY REALITY

A LARGE FOCUS OF THE CLCPA IS ON CLIMATE JUSTICE. HOW IS MAKING PEOPLE BREATHE DIRTIER AIR THAN NECESSARY CLIMATE JUSTICE?

<https://nysfocus.com/2023/06/14/new-york-air-pollution-climate-peaker-plant>

As New York Lags on Climate Goals, Some Dirty Plants May Stay Open Past Deadline

Air-polluting “peaker” plants were a top priority for closure in New York’s green transition. But the state isn’t building clean energy fast enough to replace them on time.

COLIN KINNIBURGH · JUNE 14, 2023



The Gowanus Generating Station in Brooklyn is one of the “peaker” plants targeted by pollution controls. | Ken Schles

ALL IS NOT DOOM AND GLOOM

WHAT CAN BE DONE TO REDUCE GHG EMISSIONS CONSIDERING THE STATE'S LACK OF FINANCIAL RESOURCES, LACK OF LABOR, AND THE LACK OF SUFFICIENT RENEWABLE GENERATION FOR AT LEAST 7 DECADES?

WHAT YOU CAN DO TO HELP REDUCE YOUR UTILITY BILLS AND
12 IDEAS THAT CAN BE **IMPLEMENTED RELATIVELY QUICKLY BY NY STATE** THAT WILL
HELP TO **RAPIDLY LOWER GHG WITH MUCH LOWER INSTALLATION COSTS** WHILE ALSO
SLOWING OR REVERSING THE INCREASE IN UTILITY BILLS
AND A LONGER TERM SOLUTION

WHAT CAN YOU DO TO HELP REDUCE YOUR UTILITY BILLS AS ENERGY COSTS ARE GOING TO RISE SIGNIFICANTLY

- **IMPROVE THE BUILDING ENVELOPE OF YOUR HOME OR BUSINESS** - CHECK FOR AIR LEAKS, ADD INSULATION, CAULK AROUND WINDOWS, ETC.
- **CHECK THE INTEGRITY OF YOUR ROOF AND INSTALL ROOFTOP SOLAR.** SOLAR PANELS ARE GETTING LESS EXPENSIVE AND ELECTRICITY IS GETTING MORE EXPENSIVE.
- **REPLACE ALL OF YOUR BULBS WITH LED's. CHOOSE THE CORRECT KELVIN RATING** (3000 K is more yellow, 5000 K is bright White/Blue)

AT THE FACTORY, WE REDUCED CONTINUOUS LOAD BY NEARLY 12,000 WATTS CONTINUOUSLY USING LED's. THERE ARE BULBS THAT ARE A DIRECT RETROFIT TO A 4 FOOT FLUORESCENT TUBE WITHOUT REPLACING THE FIXTURE

- 1 - DO NOT ELECTRIFY BUILDINGS THAT RUN ON NATURAL GAS – WHILE IT WILL REDUCE GHG AT THE BUILDING, IT WILL INCREASE IT AS MUCH AT THE GENERATING PLANTS WHILE FORCING RESIDENTS AND THE UTILITIES TO INCUR ENORMOUS REWIRING COSTS. THERE WILL BE NO REDUCTION IN COLUMN A (FOSSIL FUEL CONSUMPTION). ALSO, THE GAS STOVE ANALYSIS THAT WAS DONE RECENTLY WAS MATHEMATICALLY FLAWED AND SHOULD NOT BE USED TO SET PUBLIC POLICY. HOWEVER OLD GAS STOVES SHOULD BE REPLACED WITH NEW ONES AND A GAS DETECTOR.**

- 2 - FOCUS HEAT PUMP EFFORTS ON LOCATIONS THAT USE OIL HEAT OR THAT USE RADIANT ELECTRIC HEAT. THOSE LOCATIONS WILL SEE A SIGNIFICANT REDUCTION OF GHG AND HEAT PUMPS WILL REDUCE GRID LOAD WHEN COMPARED TO RADIANT ELECTRIC HEAT.**

- 3 - FOCUS RESOURCES ON EXPANDING GRID INFRASTRUCTURE. THIS WILL REDUCE THE COST OF INSTALLING SOLAR IN UPSTATE LOCATIONS AND REDUCE THE NUMBER OF SYSTEM CANCELLATIONS ALLOWING THE STATE TO INCREASE COLUMN D**

- 4 - INCREASING GRID INFRASTRUCTURE WILL ALSO HELP WITH THE INSTALLATION OF CHARGERS FOR THE ELECTRIC VEHICLE WAVE THAT IS ABOUT TO ARRIVE, WITH OR WITHOUT THE STATE MANDATE.**

- 5 - DO NOT INSTALL LARGE AMOUNTS OF BATTERY STORAGE UNTIL THERE IS SUFFICIENT RENEWABLE GENERATION TO SUPPORT THE STORAGE. IT WILL INCREASE COLUMN A (FOSSIL FUEL USAGE). WHILE INCURRING AN ENORMOUS CAPITAL OUTLAY AND STARVING OTHER PROJECTS OF FUNDING. THEY WILL ALSO DECAY WELL BEFORE SUFFICIENT RENEWABLE GENERATION IS INSTALLED.**
- 6 - REPLACE OLDER GENERATING PLANTS WITH HIGHER EFFICIENCY COMBINED CYCLE NATURAL GAS GENERATING PLANTS. THE STATE WILL NEED THE ENERGY TO SUPPORT THE EV's AND THE NEWER PLANTS ARE FAR MORE EFFICIENT. IT WILL LOWER COLUMN A, REDUCE GAS USAGE AND PUT DOWNWARD PRESSURE ON THE COMMODITY PRICE.**
- 7 – DEVELOP TECHNOLOGIES OTHER THAN ELECTROLYSIS TO GENERATE GREEN HYDROGEN. (THERMOCHEMICAL, PYROLISIS, ETC.) PLACE AN EMPHASIS ON HYDROGEN INJECTION INTO NATURAL GAS COMBUSTION PLANTS. IT WILL DECREASE GAS USAGE AND INCREASE COMBUSTION TEMPERATURES WHICH REDUCES NO_x EMISSIONS AND LOWERS COLUMN A. IT WILL GREATLY LOWER GHG EMISSIONS RELATED TO THOSE GENERATING PLANTS**

- 8 - FOCUS AVAILABLE NATURAL GAS RESOURCES ON COMBINED HEAT AND POWER SYSTEMS. IT WILL REDUCE THE UTILITY BILLS FOR THE SYSTEM OWNERS WHILE ALSO REDUCING REQUIREMENTS FOR GRID INFRASTRUCTURE. ALLOW MULTIPLE BUILDINGS TO FORM MICRO-GRIDS TO UTILIZE THE THERMAL OUTPUT AND INCREASE THE GENERATION CAPACITY. IT WILL GREATLY REDUCE COLUMN A AND REDUCE THE NEED FOR AS MUCH TRANSMISSION INFRASTRUCTURE**
- 9 - ALLOW MICRON TECHNOLOGIES TO BUILD A 2 GW COMBINED CYCLE PLANT ON THEIR PROPERTY. THE MICRON FACILITY WILL USE MORE ENERGY THAN THE STATES OF VERMONT & NEW HAMPSHIRE. WITH GENERATION ON-SITE, THE THERMAL ENERGY COULD BE USED AT THE PLANT AND THE 500 GWh OF ANNUAL LINE LOSS WILL BE ELIMINATED. INSTEAD OF MAKING THEM LOOK "GREEN" ON PAPER BY BUYING CARBON CREDITS, LET THEM BE GREEN IN REALITY WITH HIGH EFFICIENCY GENERATION AND HAVE LOWER ENERGY COSTS TO MAKE THEM MORE COMPETITIVE AND ABLE TO RECOUP THE \$5 BILLION REBATE WITHOUT FAKING IT. THAT WILL ELIMINATE THE INCREASE IN COLUMN A RELATED TO THE FACILITY.**
- 10 - FIGURE OUT HOW THE UTILITIES CAN INSTALL AND INTERCONNECT THE 9 GW OF OFFSHORE WIND BECAUSE AT THE MOMENT, NO ONE IS CERTAIN HOW TO DO IT. THERE IS LIMITED SPACE FOR UNDERWATER CABLES. WITHOUT THAT, ENERGY CURTAILMENTS WILL OCCUR AND IMPEDE THE INCREASE OF COLUMN D, UNLESS THEY USE THE ALTERNATIVE IDEA WHICH IS TO RUN TRANSMISSION LINES ACROSS LONG ISLAND WHERE THERE WILL BE INEVITABLE NIMBY DELAYS.**

11 – SET UP PILOT PROJECTS FOR CONTROLLED ENVIRONMENT AGRICULTURE TO ASCERTAIN THEIR VALUE FOR YEAR ROUND FOOD PRODUCTION AND THE ELIMINATION OF CARBON DIOXIDE FROM GENERATING PLANT WASTE STREAMS

12 – AUTHORIZE THE ESTABLISHMENT OF PYROLYSIS PROJECTS FOR THE ELIMINATION OF PLASTIC WASTE, THE ELIMINATION OF ORGANIC WASTE, AND FOR THE GENERATION OF HYDROGEN THAT CAN BE USED TO IMPROVE POWER PLANT EFFICIENCY

LONG TERM SOLUTIONS

- **ADD 12 GW OF NUCLEAR TO THE GENERATING SYSTEM, PREFERABLY NEAR THE EXISTING NUCLEAR PLANTS WHERE THEY WILL BE MORE ACCEPTED AND WHERE AN EVACUATION PLAN ALREADY EXISTS**
- **ENERGY OUTPUT WILL BE APPROXIMATELY 100,000 GWh**
- **USE THE CIRCULAR FUEL CYCLE THAT GENERATES LESS NUCLEAR WASTE**
- **THIS OUTPUT CAN PROVIDE THE FOLLOWING:**
 - 75,000 GWh TO REPLACE THE EXISTING FOSSIL FUEL GENERATION**
 - 7,000 GWh TO SUPPORT THE MICRON FACILITY**
 - 18,000 GWh TO SUPPORT FUTURE BUILDING ELECTRIFICATION MANDATED BY THE CURRENT BUDGET**

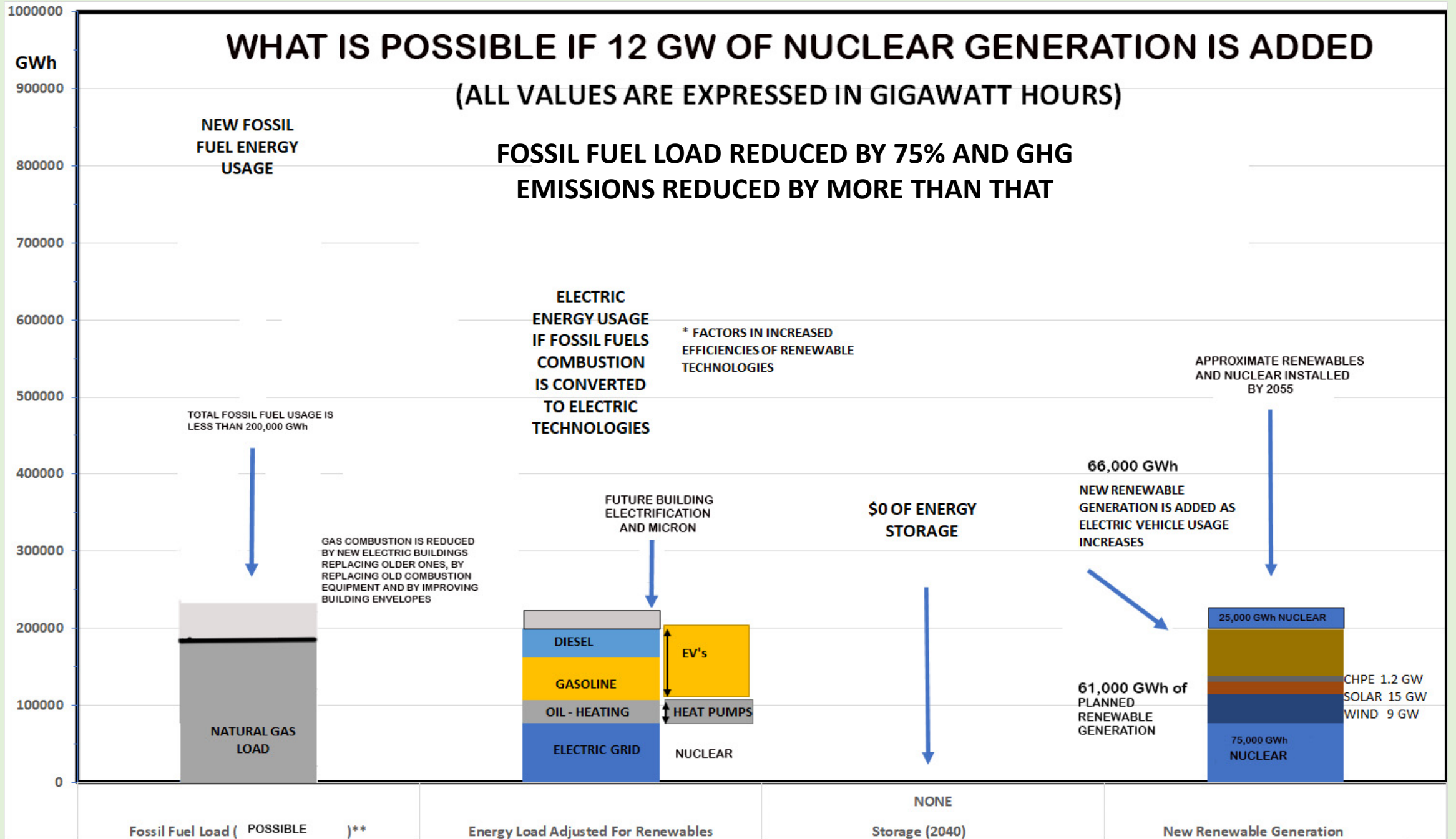
TOTAL COST WILL BE APPROXIMATELY \$150 BILLION FOR THE PLANTS AND \$75 BILLION FOR THE TRANSMISSION LINES - \$225 BILLION TOTAL

**90% LESS THAN JUST THE BATTERY COST THAT WILL BE REQUIRED ON A FULLY RENEWABLE SYSTEM
LAND AREA REQUIRED WILL BE APPROXIMATELY 20 SQUARE MILES - 3% OF THE TOTAL REQUIRED FOR 60 GW OF SOLAR
IF THE "STRANDED ASSETS" OF THE EARLY RETIRED FOSSIL FUEL PLANTS ARE FIGURED, IT WILL ADD AN ADDITIONAL \$30 BILLION. \$ 255 BILLION IS STILL FAR LESS THAN THE BATTERIES.**

WHAT IS POSSIBLE IF 12 GW OF NUCLEAR GENERATION IS ADDED

(ALL VALUES ARE EXPRESSED IN GIGAWATT HOURS)

FOSSIL FUEL LOAD REDUCED BY 75% AND GHG EMISSIONS REDUCED BY MORE THAN THAT



OTHER IMPORTANT CONSIDERATIONS

START PREPARING THE PUBLIC NOW TO ACCEPT THE RECERTIFICATION OF THE UPSTATE NUCLEAR PLANTS. THERE IS A SEGMENT OF THE PUBLIC THAT SEEMS TO THINK THAT THEY AREN'T NEEDED. THEY COULDN'T BE MORE WRONG.

START NOW WITH PLANNING TO FIGURE OUT WHAT WILL REPLACE THE LOST ENERGY WHEN THE UPSTATE NUCLEAR PLANTS HAVE TO BE RETIRED BECAUSE THEY ARE TOO OLD. THEY ARE NOT GOING TO LAST LONG PAST 2050 AND THAT IS ONLY 27 YEARS AWAY. WHILE THAT MAY SEEM LIKE A LONG TIME, IT WILL HAVE TAKEN 15 YEARS TO GET THE CHPE UNDER CONSTRUCTION BETWEEN IDEA AND ACTUALLY HAVING IT OPERATING. RENEWABLES WILL NOT PROVIDE NEARLY ENOUGH ENERGY TO OFFSET THE NUCLEAR PLANTS AS THOSE PLANTS GENERATE 20% OF THE STATE'S ELECTRIC ENERGY.

LET'S USE COMMON SENSE SOLUTIONS TO KEEP THE LIGHTS ON IN NY STATE BECAUSE WHEN FANTASIES MEET REALITY, REALITY ALWAYS WINS!!

THE CLCPA IS A HINDERANCE TO GREENHOUSE GAS REDUCTION EFFORTS

**CONTACT YOUR STATE SENATOR AND ASSEMBLY PERSON TO GET THEM TO
CHANGE THIS POLICY AND
MODIFY OR REPEAL THE CLCPA**

**SO THAT THE PUBLIC SERVICE COMMISSION AND THE NYISO HAVE THE
TOOLS NEEDED TO ADDRESS ENERGY SHORTAGES AND CLIMATE CHANGE
IN A COST EFFECTIVE AND SCIENTIFICALLY ACCURATE MANNER**

MORE INFORMATION IS AVAILABLE AT:

WWW.SAVENYENERGY.COM

ADDITIONAL INFORMATION

ADDITIONAL INFORMATION CAN BE FOUND AT

WWW.SAVENYENERGY.COM

PAGES 35 & 92 FROM THE NYSDERDA ENERGY STORAGE REPORT EXPLAINING THE \$3.4 TRILLION ENERGY STORAGE COST

4 Storage Deployment Barriers

4.1 Supply Chain and Material Costs

The rapid growth of the energy storage and EV industries has been fueled by the technological improvements and price reductions in lithium-ion batteries. Lithium-ion batteries represent an overwhelming majority of all stationary and mobile storage deployments, resulting in both competition between automotive and grid-connected segments and sensitivities across segments to supply chain issues and material price increases.

Since July 2021, prices for lithium carbonate, a key ingredient of lithium-ion batteries, have increased 500%.³⁴ Among projects awarded NYSDERDA incentives, average total installed costs for non-residential, retail projects averaged \$567/kWh for installations occurring in 2022 and 2023, up from \$464/kWh for installations in 2020 and 2021, an over 20% increase in total costs.³⁵ This is consistent with recent industry reports that indicate near-term increases in storage costs.³⁶ Also in 2021, the electric vehicle market more than doubled while global energy storage deployments tripled.³⁷ Manufacturing and distribution of battery components and battery packs have struggled to keep up with the pace of demand growth. This has led to delays in deliveries, higher costs for storage assets, and in some cases, unmet demand. These factors are likely to impact the ability of storage to be deployed by the market until supplies increase.³⁸ Furthermore, this combination of factors has kept energy storage from being able to be deployed in the absence of market support mechanisms.

Efforts by the Federal Government, as well as the European Union, seek to expand and diversify supply in the coming decade to address overall supply, supply chain, and material cost issues.³⁹ However, the impacts of these interventions will take time to manifest and are unlikely to begin easing the cost issues until 2024-2025 at the earliest, with major improvements only expected by the end of the decade and into the 2030s. Given the time required to plan, study, construct, and commission energy storage projects, simply waiting for cost reductions, driven by factors outside New York's control, before beginning new deployments is not an option as the state pursues its decarbonization and renewable integration goals. For example, large-scale bulk storage projects often require five years or more between interconnection request and commissioning. Waiting to procure these resources until price reductions have been achieved near the end of the decade will result in projects coming online in the mid-2030s, beyond the timeline

Page 92 of the document. Page 94 of the pdf. New York's 6 GW Energy Storage Roadmap:

Math at bottom of page.

Solar output is highest in the summer and lowest in the winter, and wind output is complementary to solar, as shown in Figure 40. With seasonal storage (1000+ hours), the availability of a specific resource during critical weeks – or in between multiple critical weeks in a season matters less; instead, the cheapest form of energy, such as solar in the spring and summer, can be stored and discharged over multiple winter weeks.

In the challenging weeks highlighted in Figure 41, output is lower than average while wind output is at or above average. As a result, although solar is cheaper on average over the course of the year, 100-hr storage needs to be paired with more expensive land-based or offshore wind, which can both directly meet load and be used to recharge storage between multiple critical weeks in this period. Figure 42 illustrates how the 100-hr storage with added renewables can fill the firm-resource need in the week highlighted in Figure 41.

Figure 40. Variation in Solar and Wind Generation over a Year



Notes: Seasonal LCOE is defined as the LCOE of the resource if its annual capacity factor was instead equal to the capacity factor in that season. For example, the Winter LCOE of solar is (Total costs) / (10% * 8760). If the capacity factor of solar over the winter is 10%. These figures are intended to illustrate the underlying economic dynamics at a high level, but they do not capture the full complexity of loss-of-load probability analysis and portfolio optimization to ensure system reliability is maintained over many years of weather conditions.

GW = Gigawatt=1 billion watts Watts are a measure of Power
KW = Kilowatt = 1000 watts

KWh = Kilowatt-Hours Kilowatt-Hours are a measure of Energy

6 GW = 6,000,000 KW x 1000 hours = 6,000,000,000 KWh * \$567/KWh = \$3.4 Trillion

Initial Report on the New York Power Grid Study
January 19, 2021

Documenting Issues With Interconnection of 9
GW of Offshore Wind and Possible Curtailments

PREPARED BY

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Pterra Consulting

ii. Feasible Siting and Permitting

The OSW Study concludes that interconnecting 5-6 GW of OSW into Zone J should be feasible with sufficient planning and coordination to efficiently use scarce cable routing corridors through the New York Harbor and limited space at the POI substations. In addition to the planned cables, it would require **siting four 1,300 MW cables and securing landing points** in Zone J. Routing four additional cables through the New York inner harbor may be challenging, however. For example, Intertek (in a study for Anbaric) previously concluded that limited space through the Narrows and into the inner harbor may be able to accommodate only four cables, including the two for the already-contracted OSW facilities.⁵⁸ This could limit OSW interconnections into New York City to only 3-4 GW, even assuming larger transfer capability of the individual cables. OSW interconnections into New York City would be further limited if the cables were sized below the 1.3 GW that the OSW Study assumed for all cables beyond those currently planned. Should these challenges limit interconnections in New York City below the 5-6 GW amounts studied—either routed through the harbor or brought into New York City through the Long Island Sound—more than 3-4 GW of OSW generation may need to be interconnected to the onshore grid on Long Island, leading to substantially higher curtailment and the need for additional onshore transmission from Long Island to the rest of the State to mitigate the risk of these curtailments.

Integrating offshore wind will also depend on **accessing POIs** that are jointly feasible on the transmission system and have sufficient space for the necessary interconnection equipment. The various studies do not all reach the same conclusions on which POIs are feasible, nor are the studied POIs consistent with utilities' study assumptions and the NYISO interconnection queue, as shown in Figure 13 below. In fact, the Beacon and Empire 2 Offshore Wind projects, which were provisionally awarded to Equinor Wind US LLC in January 2020, are expected to interconnect at different POIs—Astoria 138 kV in Queens, and Barrett Substation in Nassau County of Long Island; these projects provide a total 2,490 MW of offshore wind capacity.⁵⁹ In

STATE POLICY IS GOING TO INCREASE ENERGY LOSSES RELATED TO THE MICRON PLANT BY APPROXIMATELY 5% RELATED TO TRANSMISSION LINE LOSSES. ON THE EVENTUAL 7 TERAWATT HOURS OF USAGE, THAT AMOUNTS TO 350 GWh ANNUALLY BEYOND WHAT COULD BE DONE WITH INTELLIGENT PLANNING

MICRON GETS NYPA POWER BOOST: The New York Power Authority board of trustees is poised to approve a big chunk of lower-cost and market-purchased power for a megaproject in the Syracuse area. The board is set to vote today on awarding Micron, which has committed to building a \$19.3 billion new semiconductor manufacturing plant in Clay, 140 megawatts of low-cost hydropower through the authority's ReCharge New York program geared toward economic development. NYPA would also supply 404 MW of market power under its "high load factor" program for large energy users which enables a lower delivery charge. That's likely the largest contract for the program, which has also approved an allocation for a cryptocurrency mining project, and currently total about 361 MWs including 143 MW for Plug Power, according to data including pending contracts through the end of 2022 provided by NYPA.

This is not the last round of electricity awards for the project, which is being built out in phases. Future applications for more power from NYPA are expected, according to NYPA's agenda for the meeting. Micron has committed to [using 100 percent renewable energy at its new facility](#). The NYPA high load program is simply market electricity procured by NYPA, not hydropower or another renewable resource. — *Marie J. French*

WHERE IS THE RENEWABLE ENERGY FOR MICRON GOING TO COME FROM? THE TWO LARGEST STATES TO THE SOUTH AND WEST (OHIO & PENNSYLVANIA) AVERAGE ONLY 1.4% RENEWABLE

Pennsylvania Energy Consumption Estimates 2020

<https://www.eia.gov/state/?sid=PA>

16:12:04 GMT-0400 (Eastern Daylight Time)

Source: Energy Information
Administration

Category	Pennsylvania Energy Consumption Estimates Trillion Btu
Coal	374.3
Natural Gas	1783
Motor Gasoline excl. Ethanol	465.5
Distillate Fuel Oil	309.8
Jet Fuel	45.1
HGL	48.6
Residual Fuel	1.4
Other Petroleum	87.8
Nuclear Electric Power	799.3
Hydroelectric Power	23.4
Biomass	152.3
Other Renewables	42.2
Net Electricity Imports	0
Net Interstate Flow of Electricity	-713.7
TOTAL BTU	3419
TOTAL Renewable	65.6
% Renewable	1.92%
Total Renewable/Nuclear	864.9
% Renewable/Nuclear	25.30%

Ohio Energy Consumption Estimates 2020

<https://www.eia.gov/state/?sid=OH>

16:11:20 GMT-0400 (Eastern Daylight Time)

Source: Energy Information
Administration

Category	Ohio Energy Consumption Estimates Trillion Btu
Coal	556.8
Natural Gas	1233.4
Motor Gasoline excl. Ethanol	489
Distillate Fuel Oil	289.3
Jet Fuel	31.4
HGL	37.3
Residual Fuel	2.2
Other Petroleum	142.7
Nuclear Electric Power	190.3
Hydroelectric Power	3.3
Biomass	120.8
Other Renewables	27.3
Net Electricity Imports	0
Net Interstate Flow of Electricity	288.7
TOTAL BTU	3412.5
TOTAL Renewable	30.6
% Renewable	0.90%
Total Renewable/Nuclear	220.9
% Renewable/Nuclear	6.47%

BENEFITS OF BURNING A HYDROGEN/NATURAL GAS MIXTURE IN GENERATING PLANTS

- **2. Burner Combustion of Natural Gas Mixed with Hydrogen**

Natural gas consists mainly of methane. Combustion properties of hydrogen and methane are given in Table 1. (Next Slide) Hydrogen has wider flammability limits, a faster burning velocity and a smaller minimum ignition energy than methane. Owing to these properties, the flame in burner combustion of hydrogen–air mixtures, with and without premixing, is hard to extinguish due to flame lifting and easy to backfire. The burner combustion is accompanied by generation of a considerable amount of nitrogen oxides (NO_x), about 500 ppm. Although the NO_x concentration decreases largely by increasing the premixing ratio of air, the increase of the air ratio causes the likelihood of backfiring. The suppression of NO_x generation and backfiring is a trade-off, and is called “a dilemma in hydrogen combustion using burners.”

In contrast, when hydrogen is burned as a mixture with natural gas, in principle, its favorable and unfavorable combustion characteristics bring about the following positive features. The burner combustion proceeds stably due to the increase of the flammability limits and the reduction in backfire and ignition energy. A large thermal energy with a small burner is obtainable due to the increase of the combustion energy per volume. Generation of NO_x can be suppressed without causing backfiring in a larger premixing ratio of air.

Copied from the following link: https://www.eolss.net/ebooklib/sc_cart.aspx?File=E3-13-05-02

TABLE 1.

**COMBUSTION PROPERTIES OF HYDROGEN.
METHANE AND PROPANE**

CONTINUATION OF PREVIOUS SLIDE

Property	Hydrogen	Methane	Propane
Density of gas at NTP ^{a)} (kg m ⁻³)	0.0838	0.6512	1.87
Heat of combustion ^{b)} (low) (MJ m ⁻³)	10.78	39.72	99.03
Heat of combustion ^{b)} (high) (MJ m ⁻³)	12.75	35.80	91.21
Flammability range (limits) in air ^{c)} (%)	4.1 - 75	5.3 – 15	2.1 – 10
Stoichiometric composition in air ^{c)} (%)	29.53	9.48	4.02
Minimum ignition energy (mJ)	0.02	0.29	0.26

Minimum self ignition temperature ^{d)} (K)	858	813	760
Adiabatic flame temperature in air (K)	2318	2158	2198
Burning velocity ^{d)} (cm s ⁻¹)	237	42	46
Detonability range in air ^{c)} (%)	18 – 59	6.3 - 13.5	3.1 – 7.0
Energy of explosion of gaseous fuel ^{b)} (MJ m ⁻³)	9.9	32.3	93

a) NTP = normal temperature and pressure (293.15 K, 0.1013 MPa).

b) 273.15 K, 0.1013 MPa).

c) in a volumetric ratio.

d) a stoichiometric mixture.

Hord J., International Journal of Hydrogen Energy Vol. 3, 157-176 (1978). International Association of Hydrogen Energy.

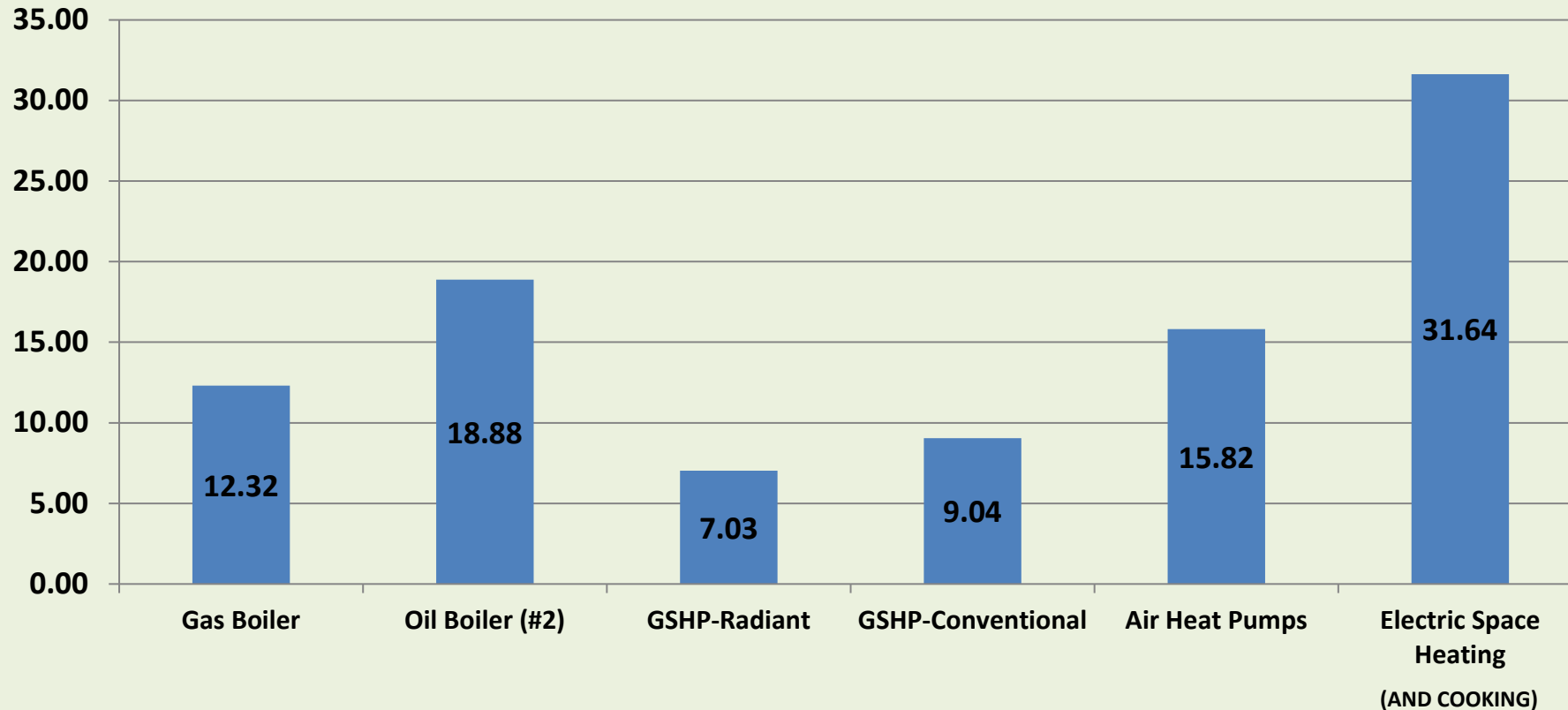
Source Book for Hydrogen Applications, Hydrogen Research Institute and National Renewable Energy Laboratory.

Copied from the following link:

https://www.eolss.net/ebooklib/sc_cart.aspx?File=E3-13-05-02

Table 1. Combustion properties of hydrogen, methane, and propane.

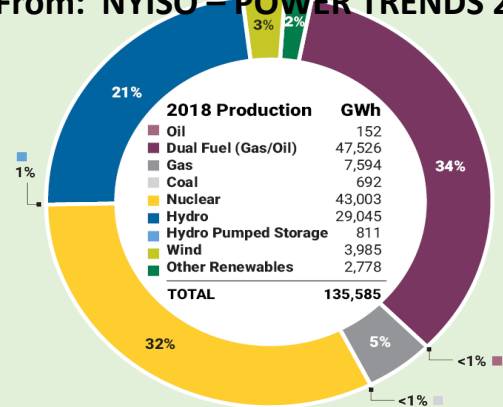
POUNDS OF CO₂ EMITTED PRODUCING ONE THERM OF ENERGY AT THE CUSTOMER PREMISES FOR VARIOUS HEATING METHODS (In the NY Metro Area)



Refer to Slide #53 for Additional Information on these values

Electric Generation Sources NY State - 2019

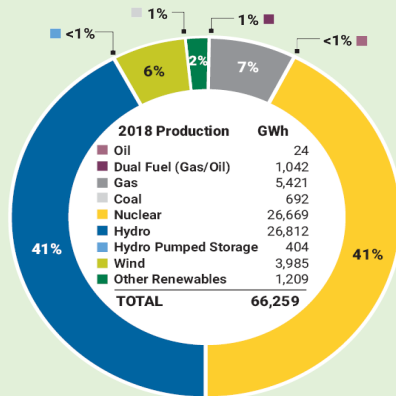
NYCA ENERGY PRODUCTION
From: NYISO – POWER TRENDS 2019



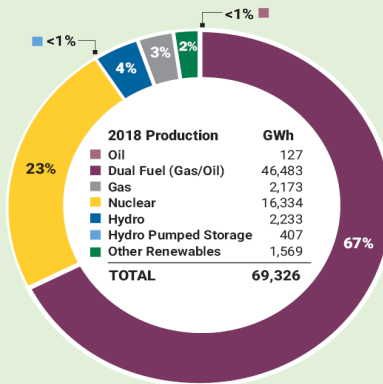
Current Distribution - Electric Grid Only

55,964 GWh from Fossil Fuels
 43,003 GWh Nuclear
 29,856 GWh Hydro/Pumped Hydro
6,763 GWh Renewable
 135,586 GWh Total

UPSTATE ENERGY (Zones A-E)



DOWNSTATE ENERGY (Zones F-K)



2022 Distribution** – After Indian Point Closure

Reduction of 16,334 GWh – Nuclear
 Includes Cricket Valley GCC – 9636 GWh

65,600 GWh from Fossil Fuels
 26,669 GWh Nuclear
 29,856 GWh Hydro/Pumped Hydro
 6,763 GWh Renewable
6,698 GWh Other – Balance of Lost Production from IP
 135,586 GWh Total

** Assumes Constant Load But Usage in NY State
 Actually Increased by approx. 3% from 2017 to 2018

State Forecast Electric Usage 157,000 GWh.
 21,500 GWh from Out of State

**DOES NOT INCLUDE ANY CAPACITY FOR
 INCREASED EV CHARGING**

Comparison of Various Heating Methods

Holistic Energy Usage and Cost

ADDITIONAL MARGINAL GRID LOAD WILL BE AT FOSSIL FUEL EFFICIENCY LEVELS WITHOUT SUFFICIENT RENEWABLES INSTALLED

1 Therm = 100,000 BTUh = 29.307 KWh
 141,700 BTUh = 1 gallon #2

11.7 LBS CO2 per Therm/.95 for gas at source
 16.1 LBS CO2 per Therm/.87 for Oil at source

National Average- All Generation 1.004 pounds CO2 per KWh

<https://www.eia.gov/tools/faqs/faq.php?id=73&t=11>

Energy used to generate 100,000 BTUh of heat at the customer premises

Type of Heat	Efficiency	KWh/Therm	KWh Used at premises	KWh Total (w/ T & D losses)	KWh Total (w/ generation losses and T & D losses)	Cost/Therm	LBS CO2 EMITTED	
Gas Boiler Conventional HW	0.95	29.31	30.85		30.85	\$1.38	12.32	
Oil Boiler (#2) Conventional HW	0.87	29.31	33.69	0.82 gallons	34.36 **	\$2.75	18.88	
COP								
GSHP-High Mass Radiant (100 deg-F)	4.5	29.31	6.51	7.00	17.60	\$1.50	7.03	
GSHP-Conventional HW (150 – 160 deg-F)	2.5	29.31	11.72	12.61	31.68	\$2.70	12.66	
	3.5	29.31	8.37	9.0	22.63	\$ 1.93	9.04	
Air Heat Pumps Conventional HW	2	29.31	14.65	15.76	39.60	\$3.37	15.82	
Electric Space Heating & Electric Cooking	1	29.31	29.31	31.51	79.21	\$6.74	31.64	
				Leaving Power Plant	Entering Power Plant			

\$1.30/therm

\$.23/KWh

\$ 3.35/gallon #2 Fuel Oil (NYSERDA Website)

<https://www.nysERDA.ny.gov/Researchers-and-Policymakers/Energy-Prices/Home-Heating-Oil/Average-Home-Heating-Oil-Prices>

37% Efficient Utility system (Generation and Distribution)

** 2% added to Energy usage for Oil Transportation - Diesel Fuel used to transport the oil is identical to #2 Fuel Oil

Air Emissions

Due to the age and technology of the steam plants, the National Grid steam plants are significant sources of air pollution, emitting orders of magnitude more air pollutants than a modern base load, combined cycle power plant. The table below summarizes the emissions of various pollutants per unit of electrical output for the National Grid steam plants. The data is derived from filings of emissions data with the NYSDEC and production data filed with the U.S. Department of Energy. Data for the Caithness Long Island plant was calculated as an example of a modern gas-fired, base load combined cycle power plant.

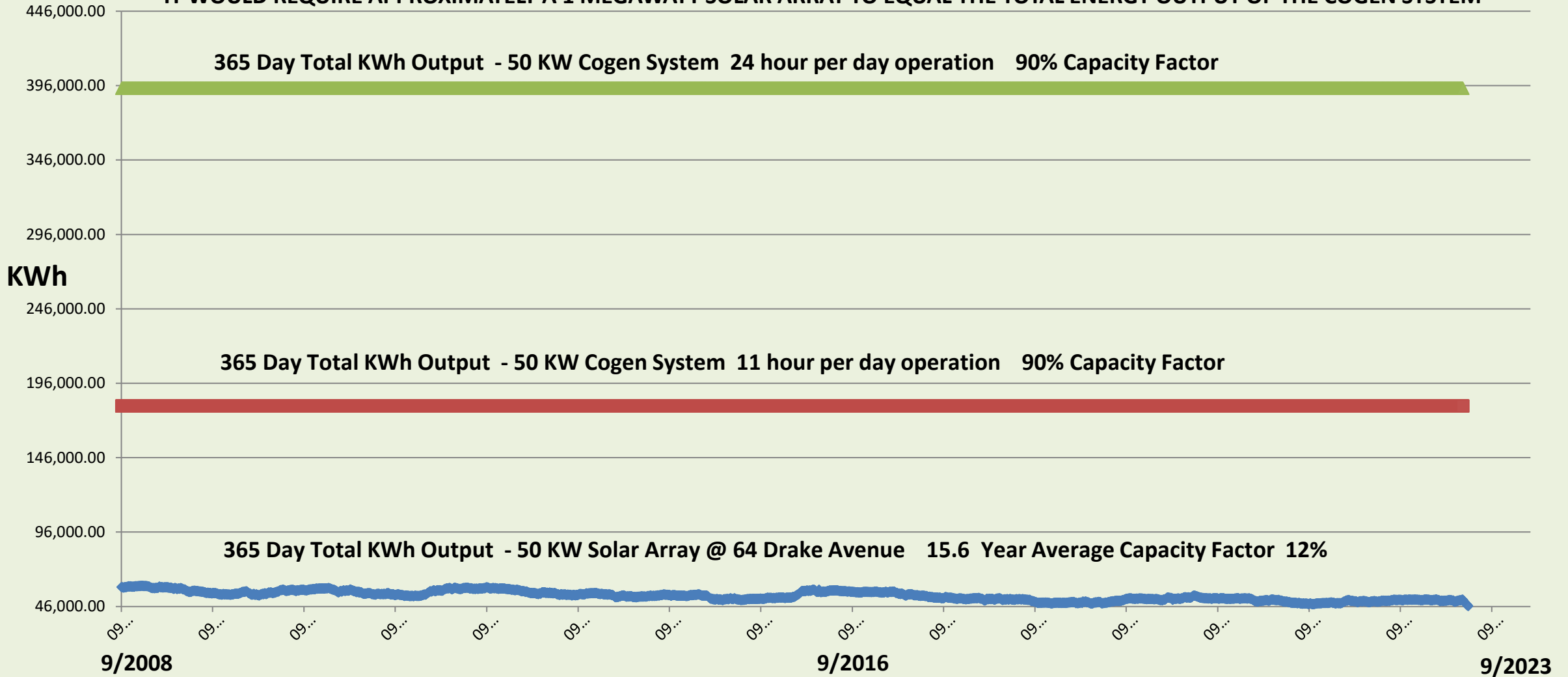
Average Annual Air Emissions of National Grid Steam Power Plants 2010-2013 Facility

	CO (lb/MWh)	NOx (lb/MWh)	PM10 (lb/MWh)	SO2 (lb/MWh)
E.F. Barrett	1.7	1.5	0.11	0.03
Northport	0.92	0.88	0.13	0.64
Port Jefferson	1.03	0.86	0.14	0.88
Caithness Long Island	0.02	0.12	0.03	0.01
COMBINED CYCLE GENERATING PLANT				

(CO=Carbon Monoxide, NOx=Nitrogen Oxides, PM10=Particulate Matter, SO2=Sulfur Dioxide, , lb/MWh= pounds per megawatt-hour)

COMPARISON OF ANNUAL ELECTRIC ENERGY OUTPUT OF A 50 KW SOLAR ARRAY vs. A 50 KW MICROTURBINE SYSTEM RUNNING 11 HOURS PER DAY OR 24 HOURS PER DAY

THESE FIGURES DO NOT INCLUDE THE ENERGY UTILIZED FROM HEAT RECOVERY THAT ALSO OCCURS WITH THE COGENERATION SYSTEM
IT WOULD REQUIRE APPROXIMATELY A 1 MEGAWATT SOLAR ARRAY TO EQUAL THE TOTAL ENERGY OUTPUT OF THE COGEN SYSTEM



15.6 Years of Operation of the Solar Array – Turned On 9/29/2007

LOCAL LAW 97 – NY CITY BUILDING ELECTRIFICATION



accelerator.nyc | 212.656.9202

Local Law 97 Primer for New Construction Buildings

This document provides an overview of New York City's Local Law 97, with a focus on new construction buildings and the impacts of the recently passed fossil fuel phaseout legislation, Local Law 154. This document also provides some considerations for building owners as they weigh various electric solutions for their buildings.

NYC Climate Laws Affecting New Construction

Local Law 154

In December 2021, NYC passed legislation requiring new construction to be all-electric starting in 2024. Local Law 154 (LL154) prohibits the combustion of any substance that emits 25 kilograms or more of carbon dioxide per million British thermal units of energy in new buildings, which effectively prohibits the use of gas and oil but allows the use of electricity. This legislation also takes advantage of the state's goal to achieve a 100% clean grid by 2040. Electric equipment results in reduced emissions, improved indoor air quality for tenants, and reduced first cost of piped fuel infrastructure.

Local Law 97

Local Law 97 (LL97) applies to buildings 25,000 square feet and above. This law sets carbon limits that tighten every five years and creates a series of annual fines for exceeding those limits. Compliance periods in the current legislation are 2024–2029 and 2030–2034. Developers of new buildings designed to meet code or above-code performance standards should not assume that their buildings will automatically comply with LL97 and should carefully consider low-carbon solutions early in design. Also, because LL154 requires all-electric equipment, which prevents the need for high greenhouse gas (GHG) emitting fuels, buildings constructed in 2024 and beyond will be well-positioned for compliance with carbon emissions caps set by LL97.

Plan Now for 2030 and Beyond

Each building has its own near-term targets in each LL97 compliance period based on building type and size. Table 1 summarizes the carbon emissions limits for three major building typologies for compliance periods 2024 and 2030.



Building Type and LL97 Emissions Limits	R-2 (includes apartments)	B (includes offices)	R-3 (includes hotels)
2024–2029	6.75 KgCO _{2e} /SF	8.46 KgCO _{2e} /SF	9.87 KgCO _{2e} /SF
2030–2034	4.07 KgCO _{2e} /SF	4.53 KgCO _{2e} /SF	5.26 KgCO _{2e} /SF

Table 1. 2024 and 2030 carbon emissions limits in kilograms of carbon dioxide equivalent per square foot for multifamily apartments, offices, and hotels. Limits for all other building types are included in the law.

Efficient electric buildings have a better chance of avoiding fines than buildings with on-site combustion, particularly as emissions caps tighten. There are a few unknowns that limit the ability of the building sector to predict compliance:

- The rule-making process has yet to be finalized — meaning some important details of how the law will be implemented have not been decided upon.
- The emissions coefficients will change over time — likely meaning electricity will get progressively less carbon-intensive and will therefore contribute less to a building's emissions.

All-Electric Considerations

All Buildings

All electric heating and domestic hot water (DHW) systems provide more options and flexibility than traditional centralized fossil-fuel based systems. Electric systems can be centralized; decentralized, where the equipment is located within individual units; or even submetered or direct metered so that individual building occupants are responsible for costs. Electric systems also provide more control options, providing the potential for better system operation, optimized efficiency, increased thermal comfort, and improved indoor air quality. There are pros and cons to various electric systems and configurations — see the NYC Accelerator All-Electric Matrix for further discussion of this topic.

Affordable Housing

Affordable housing has more time to comply with LL154 and can follow an alternate compliance pathway under LL97.¹ However, these buildings are still strongly encouraged to embrace all-electric now.

Affordable housing developers considering all-electric construction often have questions about utility bills, particularly how to meter tenant electric heating use and whether to shift costs to tenants. NYC's Department of Housing Preservation and Development (HPD) has released new electric heating policies for HPD development projects to encourage efficient systems, discourage poorly performing systems, and protect tenants.

¹ <https://www1.nyc.gov/site/sustainablebuildings/requirements/affordable-housing.page>



These policies restrict the conditions and technologies for which building owners can charge tenants for electric heat:²

- Electric resistance heating and hot water heating are not permitted.
- Packaged cold-climate heat pumps may not be installed with tenant-paid heating.
- Tenant-paid electric heat is only permitted through HPD's new Tenant-Paid Heat Pump Pilot, which includes strict protocols.

For all other buildings, owners can shift the cost of electric heating to tenants, with approval. HPD maintains NYC's monthly rent allowances for apartments that are directly metered for space heating. The amount of the rent reduction may or may not be larger than the operational cost savings afforded by shifting heating costs to the residents. Table 2 below details these allowances, which went into effect on May 1, 2021.

Bedrooms	Gas	Electric	Total Gas & Electric	Gas Heat & Hot Water	Oil Heat & Hot Water	Electric Heat & Hot Water	Heat Pump Heat & Hot Water	Water & Sewage
SRO	\$22	\$64	\$87	\$62	\$107	\$88	\$35	\$68
Studio	\$22	\$64	\$87	\$62	\$107	\$88	\$35	\$68
1	\$25	\$72	\$97	\$72	\$126	\$129	\$52	\$72
2	\$28	\$93	\$121	\$83	\$152	\$215	\$87	\$100
3	\$31	\$115	\$146	\$94	\$179	\$301	\$121	\$142
4	\$35	\$136	\$171	\$103	\$205	\$384	\$155	\$184
5+	\$38	\$157	\$196	\$113	\$232	\$467	\$187	\$225

Table 2. HPD Utility Allowance table, effective May 1, 2021, with electric heat pumps broken out separately from electric resistance heating.³

² <https://www1.nyc.gov/site/hpd/services-and-information/hpd-heating-policy.page>

³ <https://www1.nyc.gov/site/hpd/services-and-information/subsidy-and-payment-standards.page>



Ready to get started? Contact NYC Accelerator.

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NYC Accelerator is a program of the NYC Mayor's Office of Climate & Environmental Justice.