

Public Comment Guide on New York's Draft Climate Plan: Shifting to a 100% Clean, Renewable Electricity Grid

What this guide does

Highlights key points and recommendations to make in public comments on the NYS Climate Action Council's *Draft Scoping Plan* pertaining to **electricity**, and provides information on the public comment process and hearing schedule.

What is the Scoping Plan?

The Scoping Plan is the State's plan to implement the Climate Leadership and Community Protection Act (Climate Act), and will shape state laws, regulations, and government-wide decision-making for years to come. The Climate Act commits New York to:

- Reduce GHG emissions by **40%** by **2030** below 1990 levels, and achieve **net-zero** emissions by **2050**.
- Generate **70%** of electricity from renewable resources by **2030**, and achieve a **fossil fuel-free** grid by **2040**.
- Ensure a **just** and **equitable** transition, including dedicating 35% of the benefits of clean energy investments to Disadvantaged Communities, with the goal of **40%**.

The Draft Scoping Plan is now open for public comment, and your input can help ensure that our state has an effective and realistic plan in place to meet its climate goals.

The Importance of Achieving a Carbon-Free Grid

While electricity generation accounts for just 13% of the state's greenhouse gas emissions, electricity is the linchpin for New York's clean energy transition: The Draft Scoping Plan calls for efficient, electricity-based technologies to replace fossil fuels in buildings and transportation, which together account for 60% of the state's emissions. Most of the electricity-based replacements--electric vehicles, heat pumps for heating and hot water, induction stoves--will happen when fossil fuel-powered vehicles, equipment, and appliances reach the end of their useful life in the coming decades. If these replacements are to be truly emissions-free, the electricity grid that powers them

must be clean and renewable. The analysis for the Draft Scoping Plan estimates that demand for electricity will increase by 80% by 2050 to meet these new needs, which means that New York must ramp up renewable energy production significantly in the coming decades. At the same time, the state must *wind down* fossil fuel power plants, and eliminate fossil fuels from the grid entirely by 2040, as required by the Climate Act.

Shifting to a carbon-free grid will provide multiple benefits to New Yorkers, beyond the climate benefits, including improved air quality and public health, particularly in disadvantaged communities, where fossil fuel infrastructure has historically been sited. Many new jobs will be created in the electricity sector, with an estimated *net gain* of over 81,000 jobs by 2040.¹ While the jobs that will be gained are significantly greater than jobs that will be displaced, it will be critical to ensure the necessary support, retraining, and education is in place early on, before fossil fuel plants close, to aid affected workers as they transition to new jobs in clean energy industries.

Below are key points and recommendations to make in public comments to support and strengthen the recommendations of the Draft Scoping Plan on **electricity** and meet the emissions and equity goals of the Climate Act.

Key Points to Include in Public Comments

1) Phase out fossil fuels in electricity generation by 2040.

Many of New York's fossil fuel plants are already at retirement age (72% of gas turbines!) Express your support for the process laid out in the Scoping Plan for regulations that ensure a continual decline in GHG emissions from power plants, reaching **zero** by 2040. The Final Scoping Plan must also:

- Prioritize retirement of fossil fuel-fired plants whose emissions disproportionately harm disadvantaged communities, consistent with the Climate Act.
- Ensure protections for all communities facing plant closures, including:
 - Training and supportive services for displaced workers, beginning well before plant retirement, to enable a smooth job transition.
 - Sufficient funding of the Electric Generation Facility Cessation Mitigation Program to reduce the local property tax impacts of plant closure on municipalities and school districts.
 - Plant-owner responsibility for the costs of site remediation.
- Encourage re-use of power plant sites for battery storage. This would not only support the clean energy transition but would also help to mitigate the revenue

¹ *Jobs Study*, Just Transition Working Group. <https://climate.ny.gov/Climate-Resources>

and jobs impacts of plant closure.

2) Deny new gas infrastructure permits to avoid increases in GHG emissions and creation of more stranded assets.

3) Accelerate renewable energy development to reach the Climate Act's near-term target of generating 70% of electricity from renewable resources by 2030.

- Direct the NYS Office of Renewable Siting to set annual goals for megawatts of renewable resources to be permitted each year through 2030.
- Incentivize "agrivoltaics," or the integration of solar with agricultural production on the same land, and direct NYSERDA and the Department of Agriculture and Markets to produce educational materials and guidance for farmers, renewable energy developers, local governments, and other stakeholders. Agriculture and renewable energy can be complementary and mutually-supporting land uses, and agrivoltaics has great potential to minimize land-use conflicts and strengthen community support for renewable siting.

4) Support high-value renewable projects that contribute to equity, resilience, and smart land use.

- Prioritize pairing of solar with electrification in low-income housing, and expanded opportunities for low-income participation in community renewable energy.
- Develop incentives to encourage solar projects on rooftops, over parking lots and on brownfields to be paired with battery storage.
- Require utilities to expand the capacity of the local grid to interconnect with solar (i.e., "hosting capacity"), taking into account any priority locations for solar identified by local governments as well as optimal siting areas, like brownfields.
- Direct utilities to speed up the pace of processing interconnection applications so that investments can be made in a timely manner.

5) Provide communities with the support they need to partner in the renewable energy transition.

- Provide resources and assistance to local governments to streamline permitting and zoning for renewable energy.
- Develop a Clean Energy Development Mapping Tool for local governments to help them plan/site renewables.

- Encourage Community Choice Aggregation (CCA) programs to 1) support 100% renewable energy for supply, 2) integrate community renewable energy and other local energy programs, 3) include programs for low-income customers, and 4) engage in robust public energy education. Authorize counties, and not just villages and towns, to form CCAs.
- Expand benefits to communities hosting large-scale renewable projects, and tailor those benefits to community needs and priorities.

6) Ramp up battery storage development and demand-side solutions to reduce peak demand and enhance grid reliability.

Support Scoping Plan recommendations to:

- Expand the Clean Energy Standard to include battery storage (or create a separate Storage Standard), requiring utilities and energy suppliers to procure increasing amounts of battery storage over time as the grid becomes more reliant on solar and wind.
- Promote clean-energy solutions to reduce peak demand and maintain grid reliability, including geothermal heating and cooling and demand response programs.

7) Prioritize climate education and awareness-raising about the benefits of renewable energy. Successful implementation of the Climate Act depends upon public support and engagement to meet climate goals. It also depends on inspiring young people to pursue clean energy careers and create the workforce needed to transform New York's economy. The Final Scoping Plan should:

- Direct NYSERDA to support a well-funded statewide public information/education campaign, utilizing all forms of media. Engage partners in direct outreach, including Clean Energy Hubs, educational and community-based partners.
- Direct the State Education Department to develop climate change curricula & clean energy jobs training and opportunities in K-12 schools.

8) Develop the workforce for the clean energy transition.

- Engage the NYS Education Department, SUNY/CUNY system, labor, community-based organizations, and workforce development and private sector partners to develop and implement a strategy to recruit, train, and skill up the clean energy workforce required to shift to a zero-carbon electricity system.

- Create a State Office of Just Transition to ensure a coordinated, proactive approach to addressing issues related to economic development, job quality, socio-economic impacts, job loss, worker displacement, and job-readiness requirements for employment opportunities in emerging industries.
- Ensure that strong labor standards and protections exist across all clean energy sectors.

How you can weigh in

The public comment period opened on January 1, and has been extended through **June 10, 2022**. You can submit written comments through the portal on the Climate Action Council website, <https://nyserda.seamlessdocs.com/f/DraftScopingComments>, or email them to scopingplan@nyserda.ny.gov. Share your comments with your State legislators, as a number of Scoping Plan recommendations will require legislation.

New Yorkers for Clean Power created an online Public Comment Toolkit, where you can find tips, resources, and comment guides:

<https://nyforcleanpower.org/cac-scoping-plan/>

Make your voice heard! The Scoping Plan must be finalized by the Climate Action Council and delivered to the Governor and Legislature by December 31, 2022. Let's make sure this Plan delivers on New York's climate goals.

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