

Pragmatic Environmentalist of New York Summary Update 4/25/22 – 5/8/22

April 25, 2022 to May 8, 2022

This is an update of my recent posts at [Pragmatic Environmentalist of New York](#) and elsewhere. If you do not want to be on this mailing list then let me know. Previous updates are also [available](#).

[Climate Act Implementing Legislation](#) April 27, 2022

This post summarizes the Advanced Building Codes, Appliance and Equipment Efficiency Standards Act (Advanced Code Act) and the Gas Transition and Affordable Energy Act (Gas Ban) legislation currently being considered in the New York legislature. The two bills address the building sector components that need to be changed for the net-zero transition. I am still waiting for a feasibility analysis that shows that the net-zero transition can be done without adversely affecting affordability and reliability but apparently that is not needed for more legislation. The Gas Transition and Affordable Energy Act Assembly version (A 9329) is available [here](#). In brief, [this bill](#): “Aligns utility regulation with state climate justice and emission reduction targets; repeals provisions relating to continuation of gas service; repeals provisions relating to the sale of indigenous natural gas for generation of electricity.” The other bill, Advanced Building Codes, Appliance and Equipment Efficiency Standards Act, Senate version (S. 7176) is available [here](#) and Assembly version (A. 08143) [here](#).

As with the rest of the Climate Act these bills are sneaking through under the radar of most New Yorkers. They will be expensive, limit personal choice, and risk health and safety because limiting energy use to one electricity is not a resilient approach. One of the bills mentions New York’s energy affordability policy goal that customers should not pay more than 6% of their income for utility energy services. Unfortunately, I cannot find how many New Yorkers meet that goal. It seems to me that there should be a state-wide goal for the percentage of customers that don’t meet that target and the current value readily available. Obviously any bills that affect that target should include a contingency to not exceed or exacerbate that metric.

[Climate Act Benefits Greater than Costs Claim](#) April 29, 2022

The scoping plan claims that “The cost of inaction exceeds the cost of action by more than \$90 billion” but I believe the statement is inaccurate and misleading. This post consolidates documentation that has been presented in multiple earlier posts that supports my statement that the costs far exceed the benefits.

In brief the statement is inaccurate because the largest benefits claimed are from the avoided cost of carbon benefits. New York [guidance](#) includes a recommendation to [estimate emission reduction lifetime benefits](#) for a plan or goal. I believe that the guidance approach is wrong because it applies the social cost multiple times for each ton reduced. I maintain that it is inappropriate to claim the benefits of an annual reduction of a ton of greenhouse gas over any lifetime or to compare it with avoided emissions.

The statement is misleading because there is a caveat to the statement that is rarely mentioned. In particular, the costs are relative to the “Reference Case”. The definition of the Reference Case is so difficult to find that it is almost as if the authors did not want readers to find it. The Reference Case includes a “business as usual” projection for future activities and emissions that follows typical modeling practices. However, the “business as usual” scenario does not normally include any activities that would not be in place but for the policy goal. The Draft Scoping Plan perverts that approach by including “already implemented” strategies. The most egregious example is that because the 2035 zero-emissions vehicle law has already been passed none of the \$600 to \$700 billion in the transportation investment category is included as a direct cost of the Climate Act. When Governor Hochul signed that legislation “New York is implementing the nation's most aggressive plan to reduce the greenhouse gas emissions affecting our climate and to reach our ambitious goals, we must reduce emissions from the transportation sector, currently the largest source of the state's climate pollution” and specifically referring to the Climate Act.

If the Draft Scoping Plan described all the control measures, the expected costs for those measures and the expected emission reductions for the Reference Case, the Advisory Panel scenario and the three mitigation scenarios, then the public would be able to decide for themselves which costs associated with “already implemented” program are appropriate. As it stands now every time I hear someone talk about costs they mention \$300 billion which excludes the transportation investment category costs that are double that amount.

[New York State Electric School Buses](#) May 5, 2022

Recently Governor Hochul announced that New York would be the first state to set an electric school bus requirement. I have always advocated that the State should listen to the experts and this article describes an interview with Jeff Sweet, an engineer at the [Niagara Frontier Transportation Authority](#) (NFTA). His last task before retirement is to get the first electric buses and charging infrastructure operational for NFTA.

The costs of electric buses are significantly higher than diesel buses and there is insufficient money available to cover those higher costs. As a result, the electric bus conversion is an unfunded mandate to New York schools of at least \$3 billion. Furthermore, Sweet’s impression is that the manufacturers and many of the consultants don’t have the practical experience necessary to keep school districts from avoiding potential pitfalls that will further increase costs. Consequently, it is likely that this is another virtue signaling “great” idea that will end up doing more harm than good.

[Capital Tonight Home Heating](#) May 6, 2022

In my seven minutes of fame I was [interviewed](#) by Spectrum Cable’s [Capital Tonight](#) program hosted by [Susan Arbetter](#) about heat pumps. Last month I had watched the show when she tried to find out what the costs might be from an environmental advocate and I could sense she was frustrated because the response was evasive, “we don’t know what rebates will be available”. I wrote and said I could help with that and this interview was the result.

The blog post covers the points that we talked about before the interview. She wanted some specific numbers so I had to do some digging in the Integration Analysis spreadsheets but given time constraints we did not cover all the items. In my opinion, we managed to present her viewers an unbiased view of the Draft Scoping Plan heat pump “story”. We agree that it is important that the public understand what is included in the Plan. She gave a couple of plugs to the blog and there was an uptick in the number of visitors – triple the usual number. The good news is that we plan to do another topic in a month unless she sees something on the blog that catches her attention.

[Lights Out: The CLCPA and New York’s Energy Future](#) May 8, 2022

One of the reasons that the past two weeks was light on posts is because I went to Albany for the [Empire Center for Public Policy](#) event: [Lights Out: The CLCPA and New York’s Energy Future](#). Six speakers made brief presentations followed by questions and answers addressing whether the state can meet its energy needs under the new law and what will be the cost to New Yorkers?

There were a couple of highlights. James Hanley, Senior Policy Analyst, Empire Center for Public Policy gave an overview of his new research. The report, [Cold and Dark? New York’s Risky Energy Future](#), is a good summary of the essential problem that the Climate Act will increase demand at the same time New York is retiring existing nuclear and natural gas-fired generation. I have my fingers crossed that the Empire Center will be able to provide a recording of the event because Commissioner John Howard, New York State Public Service Commission made some remarks that deserve wide dissemination. One of the great mysteries to me has been how this will affect rate payer costs. He said that he thought the existing REC, ZEC, OREC programs and possibly some other similar programs currently add 10% to consumer bills. I agree completely with his response to a question that unelected bureaucrats should not be in control of the scoping plan. He clearly has figured out that there are issues with the ambition and schedule of the Plan.

I asked one question.

We have heard a lot about costs today and the large number of pages in the scoping plan and appendices. I am a numbers guy and want to point out that in addition of the upwards of 600 pages in the text documentation there are two spreadsheets with over 100 tables provided. Based on my analysis of those spreadsheets there are no control measure cost numbers provided. I think the Scoping Plan should describe, list the costs, and estimate the emissions reductions for all the control measures. What do you think should be provided?

Commissioner Howard responded. He basically said that it does seem that they are obfuscating the costs. He also said that people should be outraged that those cost numbers are not available. I could not have said that any better.