

Pragmatic Environmentalist of New York Summary Update 6/20/22 – 7/3/22

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](#).

The comment period for the Draft Scoping Plan that describes the implementation plan for the Climate Act ended on July 1. Posting was busy early because I put a post together for every comment submitted. However last week I did not have time to post because I was scrambling to get comments submitted. The first article summarizes all the comments.

[Overview of My Comments on the Draft Scoping Plan Comment](#) July 3, 2022

This article included a reference to each comment submitted and summarizes their key points. It recommended that the Final Scoping Plan include an implementation schedule that is based on the availability of technology that maintains current standards of reliability affordability, and environmental protections. I expect the emotional response will be that we cannot wait. However, I submitted comments that explained that the claims of an imminent, inevitable climate catastrophe are ill-considered and it is inappropriate to claim that every observed extreme weather event is evidence of climate change. The risks of an unreliable and unaffordable electric system are far greater than the over-hyped risks of climate change in New York. Furthermore, because New York's total emissions are less than one half of one percent of global emissions and total emissions have been increasing on average by more than one half of one percent per year anything New York does will get lost in the noise of global emissions changes. A conditional schedule is the rational approach to address the many unresolved technological issues.

[Climate Act Mandates that must be Considered in the Scoping Plan](#) June 24, 2022

One of the comments I submitted in the past week that I think is especially important concerned the responsibilities in the Climate Act for the Climate Action Council. Thus far, I think that Council leadership has failed to address explicit mandates related to expertise, an implementation safety valve, costs and benefits documentation, and consideration of the experiences of other jurisdictions. As a result, the discussions at meetings have bogged down into debates over minor issues while the response to the mandates has languished.

With regards to expertise the Council leadership has not reigned in some of the more vocal members who confidently assert that reliability is not an issue despite the fact that the New York Independent System Operator [Power Trends 2022](#) report notes: "Long-duration, dispatchable, and emission-free resources will be necessary to maintain reliability and meet the objectives of the CLCPA. Resources with this combination of attributes are not commercially available at this time but will be critical to future grid reliability." At some point the expertise of the experts at the organizations responsible for reliability of the electric grid needs to be incorporated into the Scoping Plan recommendations.

There also are members of the Council that seem to think that the Climate Act has no safety valve provisions. However, [New York Public Service Law § 66-p](#). "Establishment of a renewable energy

program” includes a safety valve condition: “(4) The commission may temporarily suspend or modify the obligations under such program provided that the commission, after conducting a hearing as provided in section twenty of this chapter, makes a finding that the program impedes the provision of safe and adequate electric service; the program is likely to impair existing obligations and agreements; and/or that there is a significant increase in arrears or service disconnections that the commission determines is related to the program”. I recommended that the Council focus on defining criteria for these conditions rather than arguing the viability of specific technical issues that are often outside their area of expertise.

[Climate Act Draft Scoping Plan Hydrogen Comment](#) June 23, 2022

Long-duration, dispatchable, and emission-free resources will be necessary to maintain reliability and meet the objectives of the Climate Act. This article describes my [comments](#) on the plans to use hydrogen to fulfill this requirement in the Draft Scoping Plan.

The comments described how the long-duration, dispatchable, and emissions-free resource is projected to be used in the Draft Scoping Plan, estimated how much hydrogen would be needed, and shamelessly plagiarized with permission an [article on hydrogen by Francis Menton](#) that described problems with hydrogen use. Menton wrote:

I don't know how much extra our energy would cost if we forcibly got rid of all hydrocarbons and shifted to wind and solar backed up by “green” hydrogen — and neither does anybody else. An educated guess would be that the all-in cost of energy would get multiplied by something in the range of five to ten. Yes, that would probably be a big improvement over trying to accomplish the same thing with batteries. But it would still be an enormous impoverishment of the New Yorkers in the [pointless quest](#) to possibly [shave a few hundredths of a degree](#) off world average temperatures a hundred years from now.

Ultimately the issue is that using hydrogen as the Draft Scoping Plan placeholder technology for this resource is not a sure thing. Not so long ago the idea that natural gas could be used a bridge fuel until these aspirational dispatchable emission-free resources could be tested at the scale needed, perform like a natural gas fired generating unit, and provide power at a similar cost, was generally accepted as a rational approach. The analogy for skipping the need for a bridge fuel is that the Climate Action Council wants to jump out of a perfectly good airplane without a parachute because they assume that the concept of a parachute will be developed, proven technically and economically feasible, and then delivered in time to provide a soft landing. That cannot end well and this won't either.

[Climate Act Draft Scoping Plan Benefits Comment](#) June 22, 2022

One of the first things I did when the Draft Scoping Plan was released was to analyze the benefit claims. I put together a white paper and realized just before the comment period ended that I had not submitted a comment using that material.

The Scoping Plan air quality improvement benefits range between \$100 billion and \$103 billion for the low values and the high values range between \$165 billion and \$172 billion based mostly on the impacts

of lower inhalable particulate matter. My comment argued that inhalable particulate matter ambient concentrations have dropped 16 times more since 2005 than the projected decrease out to 2050. Because they are simply using a linear no-threshold model that means that the observed benefits should be 16 times greater than their projections. I cannot accept their benefits until they show those benefits and thus validate their model.

I also pointed out issues with active transportation benefits and from energy efficiency interventions. The comments included an extensive description of all the issues with the social cost of carbon projections. Even if you swallow the presumption that considering just the negative impacts of GHG emissions and ignoring the positive impacts inherent in the methodology is appropriate, there is a calculation problem. The Scoping Plan gets higher benefit by counting benefits multiple times. If I lost 10 pounds five years ago, I cannot say I lost 50 pounds but that is what the Draft Scoping Plan says. Correcting that mis-characterization reduces the benefits below the costs. I concluded that the benefits are imaginary but the costs are real.

[Draft Scoping Plan Comments by a Business Owner](#) June 21, 2022

I helped draft comments for a friend that is the CEO of a family-owned manufacturer and service provider of equipment typically used in the finishing, chemical manufacturing, steel manufacturing and glass manufacturing industries. His comments pointed out that their manufacturing process uses natural gas for curing ovens and heat treating. Replacing that equipment alone would approach \$1,000,000. He said their business could not afford the transition.

[Draft Scoping Plan Transportation Incremental Benefits Associated with Scenario 4 Comment](#) June 25, 2022

This brief article describes a [comment](#) I submitted that was based on a [post](#) from last March. The comment was trivial but raised some general issues relative to the way the Council is addressing comments.

The technical comment dissected one aspect of Scenario 4 that is supposed to go beyond 85% reductions. In order to reduce vehicle miles travelled Scenario 4 includes a plan to build a new high speed railroad between Albany and Buffalo. The Draft Scoping Plan claims that “Incremental reductions from enhanced in-state rail aligning with 125 MPH alternative detailed in Empire Corridor Tier 1 Draft EIS” will provide a reduction of 200 million light duty vehicle miles at a per unit cost of \$6 per mile or \$1.2 billion. I estimate that the only valid cost for the difference between the rail alternatives is \$8.4 billion and that it would only provide a reduction of 64.7 million miles.

I concluded that the Final Scoping Plan must provide more detailed documentation because there is little reason to trust the cost estimates in the Draft Scoping Plan because of the pervasive issues I have found in my evaluations. I believe that the Final Scoping Plan documentation should provide sufficient information so that anyone can readily determine the costs and emission reductions for their particular concerns.