

Pragmatic Environmentalist of New York Summary Update 7/4/22 – 7/17/22

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](#).

[Climate Act Misinformation](#) July 5, 2022

At the May 26 Climate Action Council meeting the topic of misinformation came up. I found that discussion troubling and the proposed response unacceptable.

I argued that the Climate Action Council wants a propaganda campaign to support Climate Act implementation. I used [A Serf's Primer on Human Language](#) that described the contents of [Joseph Goebbels](#) diary ([translated by Louis Lochner](#)) to describe the basic principles of propaganda:

- Avoid abstract ideas – appeal to the emotions.
- Constantly repeat just a few ideas.
- Give only one side of an argument.
- Constantly criticize your opponent.

I do not believe that there is any parallel between the Climate Action Council's public information campaign and the motives of the Nazi party to indoctrinate a country to accept the evils of that regime. However, I do want to point out that propaganda can pervert any public decision-making processes. Therefore, the plan for public information should avoid unintentionally using these principles.

One of the themes of the meeting was the need to educate the public. I have no doubts whatsoever that the intent of most of those Council members asking for a public information campaign was to sell the plan by only giving one side of the story. The outreach will appeal to emotions and repeat a limited number of points. I would not be surprised at all if the outreach manages to criticize anyone who has raised issues. That is unacceptable.

Instead, I think what is needed is transparency to instill public confidence. The universal question everyone has is how much is this going to cost me. For example, relative to home heating with heat pumps, the public information campaign should let homeowners understand the range of potential impacts on costs. I repeatedly made the point in my Draft Scoping Plan [comments](#) that the Final Scoping Plan should describe all control measures, assumptions used, the expected costs for those measures and the expected emission reductions for the Reference Case, the Advisory Panel scenario and the three mitigation scenarios. That way, and only that way, will the Climate Action Council avoid misinformation itself, meet its obligation to provide full disclosure of costs and benefits, and avoid unintentional cost propaganda.

[Draft Scoping Plan Electric System Comments](#) July 7, 2022

This article sums up the Draft Scoping Plan [comments](#) I submitted related to the electric system.

I found several technical issues with the electric system analysis. I compared the capital costs in the Draft Scoping Plan against U.S. Energy Information Administration estimates. The Draft Scoping Plan

capital costs for offshore wind are half of the EIA costs. While there may be some interpretation of the battery energy storage cost that can explain why EIA costs are five times higher, I don't think there is any interpretation issue with the hydrogen fuel cell technology such that EIA estimates are five times higher in New York City and four times higher Upstate. The Draft Scoping Plan includes projects in the Reference Case such as "9 gigawatts (GW) of offshore wind electric generation by 2035", but when the costs are tallied that way, it lowers the total costs of Climate Act implementation. The Plan assumes that wind, solar, and energy storage don't need to be replaced before 2050 so I expect added costs of nearly 75% by 2050.

I concluded that the Final Scoping Plan has to respond to these issues. I also pointed out that the ultimate goal of the Scoping Plan is to inform the [Energy Plan](#) that is supposed to outline how New York state policy will guide future energy use. Unfortunately, the Scoping Plan is just a list of policies that are projected to reduce emissions consistent with the Climate Act mandates. There is no proof-of-concept feasibility analysis that shows how those policies will work together to provide reliable electricity to power the energy needs of the state. The costs are hidden in a black box that only provides limited information.

[Climate Act Comments by New York Energy and Climate Advocates](#) July 9, 2022

New York Energy & Climate Advocates (NYECA) is a non-profit, volunteer-based organization of scientists, engineers, environmentalists, business professionals, and advocates for social justice who understand the reality of climate change and the moral imperative for timely action employing effective solutions that work in the real world. The [comments](#) they submitted on the Draft Scoping Plan were impressive. I recommend reading them because of the persuasive arguments used to explain why wind, solar, and energy storage have significant implementation problems.

I concluded that their comments make a convincing case that the proposed plans have serious issues. They explain why a system that relies on wind, solar, and energy storage and excludes nuclear as a major component hasn't worked elsewhere and won't work here. Fatal flaws in the Draft Scoping Plan recommendations and documentation are described. However, they do present an alternative consistent with the Climate Act targets that addresses many of those problems using proven technology. The NYECA comments conclude: "If New York's Climate Action Council is serious about decarbonizing the electricity sector in the next seventeen years, it will embrace "firm" carbon-free power, not just as "backup" to a bloated buildout of underperforming intermittent generators, but as a significant contributor of energy to the state's electric portfolio." I agree completely with that conclusion.

[Manifesto for a New Prime Minister Lessons from Great Britain](#) July 11, 2022

This post adapted Paul Homewood's [Manifesto for a New Prime Minister](#) that offered a plan to address the fact that while polls say the British public is in favor of Net Zero, they also show that they don't want to pay for it. Homewood's manifesto does not propose to cancel Net Zero. Instead, he proposes recommendations to modify it. I suggested that adapting this manifesto to New York is appropriate now because the impacts seen in Great Britain are inevitable here.

The Climate Act has a [mandate](#) to the Climate Action Council to consider what is happening in other jurisdictions. If the Climate Action Council considers what is happening in the United Kingdom and Germany at this time the necessity for conditional implementation would be obvious. In my opinion, the desirability of these recommendations may not be obvious now but over time it will become clear that this is the way to go.

[Climate Action Council Economywide Strategies Subgroup](#) July 15, 2022

The Climate Action Council has setup three subgroups to address particular issues associated with the Draft Scoping Plan. This article describes my initial impression of the economywide strategies subgroup. I am not sure why they did not simply refer to these strategies as carbon pricing mechanisms because that is what they are talking about.

I am very pessimistic that submitted comments will be considered, much less used, to modify anything for the final scoping plan so the comment processing is just going through the motions. I think the same thing is happening with respect to the subgroups too. The three subgroups ostensibly will provide the rest of the Council their considered opinions of the issues and, I presume, recommendations on how to proceed.

I am a student of market-based air pollution control programs so I am most familiar with the economywide strategies topic. Everybody who volunteered to be on this subgroup has a vested interest in adding carbon pricing to the recommendations for the Final Scoping Plan. They got a briefing from NYSERDA and RFF who both are biased towards the approach. I showed that their briefing presentation was prejudiced. There are unmentioned issues with carbon pricing and at least one of the examples described selectively chose results that supported their pre-conceived conclusions and ignored contrary evidence.

Based on my experience and observations of trading programs, the only way for a carbon pricing scheme to actually reduce emissions is to set the price at punitive levels. I don't think that will fly. Consider that in the most recent legislative session the [Climate and Community Investment Act intended](#) to provide funding for the Climate Act never made it out of committee. [At this time](#) there is \$2.3 billion in utility debt statewide and one in six households is more than two months behind on utility bills. When gasoline prices went up this year the [Governor suspended motor fuel and diesel motor fuel taxes](#) because:

"Fuel prices have surged in recent months, hurting working families and small businesses the most, and it is crucial that we provide New Yorkers relief," Governor Hochul said. "By suspending certain fuel taxes for the next seven months, New York is providing some \$609 million in direct relief to New Yorkers -- a critical lifeline for those who need it most. At a time when families are struggling because of economic headwinds and inflation, we will continue to take bold action to reduce the economic burden on New Yorkers and get money back in their pockets."

I cannot imagine a scenario in which the proponents of carbon pricing can ever sneak a scheme through that would have a high enough cost to actually reduce carbon emissions without immediate political

pushback. The answer in the back of the book for economywide strategies is most likely pay lip service to it but don't do anything that will give political ammunition to the opposition.