Pragmatic Environmentalist of New York Summary Update May 1, 2023 to May 14, 2023

This is the latest summary update of my recent posts at Pragmatic Environmentalist of New York. I have been writing about the pragmatic balance of the risks and benefits of environmental initiatives in New York since 2017 with a recent emphasis on New York's Climate Leadership & Community Protection Act (Climate Act). This summary describes each of my posts with minimal technical jargon. If you do not want to be on this mailing, list then let me know. Previous updates and a pdf copy of the following information are also available.

NYS Climate Act Town Hall in Poughkeepsie on May 18 2023

Betsy Cashen wrote to let me know that her local group has planned an educational event at Faith Assembly of God, 25 Golf Club Lane, Poughkeepsie, NY on Thursday, May 18th, 2023 from 7-9pm. The group represents Columbia County residents who want to create a resilient community by informing our neighbors and asking questions. Some of the questions of concern:

- Why the sudden push to ban the appliances we use to cook and heat our homes?
- How feasible and reliable is it to heat our homes with expensive and vulnerable electricity made with renewable resources?
- Why blanket our best farmland with solar panels?
- Why is New York State overriding home rule?
- Why insist there is consensus when there isn't?
- Why does the State insist there is only one answer to a problem

If you are in the area then I recommend that you attend to hear the side of the story that does not get much publicity.

New York Gas Stove Ban – Beginning of the End or End of the Beginning?

In this post I described the recently passed legislation to ban the use of natural gas from most new buildings that was described as: "a major win for climate advocates, but a move that could spark pushback from fossil fuel interests". I have been following New York's net-zero transition plan for years and there are some interesting aspects associated with the "major win for climate advocates" that actually gave me some hope that this might just be the start of a dose of reality for the Hochul Administration.

The encouraging aspect for me was that the costs of the transition were finally addressed and there was recognition that some costs may be too high. I am hopeful that I might get the media and others to confront the Hochul Administration narrative that the costs of inaction for the net zero Climate Act transition outweigh the costs of action. That is nothing more than a slogan and it is misleading because unless they include a caveat that the costs in the Scoping Plan do not include the costs of "already implemented" programs like all the aspects of vehicle electrification. My analyses of costs have found that there are other significant "already implemented" program costs and that means that the Administration claim does not include all the costs to transition to net-zero. It gets worse because as far as I can tell the Integration Analysis does include the benefits of already implemented programs while it

excludes the costs. In order to get the desired result, the State analyses have a thumb pressing down on one side of the scale and the other thumb is pushing up the other side of the scale.

CNN described the New York State ban on the use of natural gas from most new buildings as "a major win for climate advocates, but a move that could spark pushback from fossil fuel interests". Advocates refuse to acknowledge the possibility that fossil fuel interests could align with the interests of the majority of New Yorkers who appreciate and value the resiliency and affordability of our existing fossil-fueled infrastructure. The proposed wholesale shift to unwanted technology without proper accounting of costs will be under intense scrutiny this year. I do not see how the Hochul Administration can avoid an open debate about the implications of the Climate Act for all New Yorkers.

Climate Act Offshore Wind New Uncertainty
This is a short post supports my observation that any every component of the Climate Act net-zero transition plans od more uncertain, more complicated, and likely more expensive than admitted by the Hochul Administration. In this instance there are two aspects of offshore wind development that I believe were not covered in the state's implementation plan.

The impetus was two articles that I saw on the same day. The first claimed that the 132-MW South Fork Offshore Wind Project, being developed by Ørsted A/S and Eversource Energy, would start operations in 2023 using 12 turbines with a power capacity of 11 MW each, The second article, How Big is Too Big for an Offshore Wind Turbine, by Ed Ballard addressed the unforeseen issues associated with turbines over 8 MW.

There were two take-home messages. The article notes that a renewable-energy insurance provider has reported " that component failures in turbines with 8-megawatt capacity or greater occur on average after just over a year" and that certainly affects the availability of these new turbines, The second point was that the insurance providers have been jacking up their premiums to cover those costs and that certainly was not included the implementation plan projected costs.

Articles Related to the Climate Act - May 2023 May 14, 2023
This post describes some articles I have noted recently that relate to the Climate Act net-zero transition plans. At the core of the Climate Act the key questions are is there a problem that warrants the complete conversion of our energy system and can the alternatives proposed replace the existing system affordably while maintaining current standards of reliability.

With regards to the need to convert the energy system I highlighted the availability of the Climate Intelligence (CLINTEL) new report entitled "The Frozen Climate Views of the IPCC: Analysis of the AR6":

> "The new Report provides an independent assessment of the most important parts of AR6. We document biases and errors in almost every chapter we reviewed. In some cases, of course, one can quibble endlessly about our criticism and how relevant it is for the overall 'climate narrative' of the IPCC. In some cases, though, we document such blatant cherry picking by the IPCC, that even ardent supporters of the IPCC should feel embarrassed."

Judith Curry described the report in a recent post. Her summary concludes:

> In any event, UN-driven climate policy has moved well past any moorings in climate science, even the relatively alarming version reported by the IPCC. The insane policies and deadlines tied to greenhouse gas emissions are simply at odds with the reality of our understanding of climate change and the uncertainties, and with broader considerations of human well-being.

With regards to implementation feasibility, I recommended two items. Mark P. Mills recently gave s testimony that makes a strong case that the presumption in the Scoping Plan that all the raw materials necessary for the Climate Act transition will be readily available. He argues that renewable energy isn't as clean and green as advertised because of an unavoidable feature of wind and solar resources; they have very low energy density. He explains: "that means, compared to using hydrocarbons, one must build machines that occupy roughly ten-times more of the earth's surface to deliver the same amount of energy to society—whether it's an hour of heat, or light, or computing time, or a mile of driving." He concludes that the result is that the transition will be very risky.

I also highlighted a couple of articles about electric vehicles. Robert Bryce asked how can the conversion to electric vehicles possibly work out when Ford loses $66,446 per vehicle sold? He believes and I concur that it is only a matter of time until the money runs out. The other article by Timothy Nash described 25 reasons why Biden's EV goals are economically and environmentally harmful.

New York Sea-Level Rise Projection Methodology Update

I submitted a response to the New York State Department of Environmental Conservation (DEC) request for comment on its proposed method for development of updated projections of sea level rise along New York State's tidal coast. The Part 490 regulation is in place to provide guidance for planning and includes a requirement to update its projections every five years.

The proposed methodology guarantees that Part 490 projections of sea-level rise will over-estimate potential planning requirements. I compared the observed sea-level rise with the projections from five years ago and showed that the projection of only one of the five scenarios was remotely close. I found that the proposed methodology provides biased estimates of sea-level rise through the selective choice of IPCC sea-level rise scenarios that are based on an unlikely emissions future. I recommended in my comments that the projections include one scenario that extrapolates the observed trend of sea-level rise and one that uses a more reasonable emissions scenario projection. They have the upper range covered but there is nothing representative of a more likely lower range projection.

Comments on RGGI Third Program Review

The Regional Greenhouse Gas Initiative (RGGI) is a carbon dioxide control program in the Northeastern United States. One aspect of the program is a program review that is a "comprehensive, periodic review of their CO2 budget trading programs, to consider successes, impacts, and design elements". This post described the comments I submitted on the third program review process that is underway.

The emphasis of my comments was on two aspects of RGGI. While proponents claim that it has been an unconditional success, my work has shown that there are significant caveats and limitations to its success. It has successfully raised money since the start of the program in 2009 but as an emission reduction program it is only responsible for a small (~15%) share of the observed reductions over that

time. As a result, future emission reduction requirements should consider that lack of effectiveness because maintaining the historical rate of emission reductions is unlikely.

There is another uncertainty aspect. Up to this point, there has been a sizable surplus of allowances or permits to generate emissions. That surplus is approaching unprecedented minimum levels and scarcity of a marketable product usually results in increased costs. In addition, the fraction of allowances owned by non-compliance entities, (organizations that own allowances for investment rather than compliance purposes) has been increasing as the allowance bank gets smaller. I predict that at the end of 2023 when affected sources have to surrender an allowance for each ton of carbon dioxide emitted, that some of those sources will have to obtain them from sources that know that the penalties for non-compliance are large. This is another unprecedented situation so I recommended caution of any changes in the program.

Guest Post: Energy and Climate Content in the Budget Bill

I had been meaning to write a post about the energy climate content in the recently enacted state budget bill. Keith Schue prepared summary and graciously consented to let me post his work.

Keith described five relative components in the budget bill. Part N within the Revenue budget bill mandates the use of an appraisal model that shortchanges communities by preventing local governments from receiving adequate tax revenue for the solar/wind projects forced upon them and explicitly interferes with active litigation filed by several towns which had argued that the model was developed in violation of the State Administrative Procedures Act (SAPA). After several years of trying the Hochul Administration has caved to those calling for the New York Power Authority (NYPA) to build renewable energy projects under the optimistic belief that Government will be able to build projects that meet the schedule of the Climate Act better than the private sector. Keith explains the rationale and unintended consequences.

The bill that got the most coverage was the forced electrification of new buildings as I discussed in my own post. Note that the legislation includes a number of exceptions, such as for large commercial, restaurants, industry, manufactured homes, car washes, laundromats, hospitals, back-up generators, and critical infrastructure. Given the controversy it will be interesting to see how the Climate Act requirement to extend this to existing buildings plays out.

He also covered a couple of cap and invest aspects. There was no action on a couple of bills that included specific implementation requirements. The budget creates a Climate Action Fund for the purpose of helping to compensate for the increased cost to New Yorkers of implementing climate action. The fund is divided into three different accounts: a Consumer Climate Action Account (at least 30%); an Industrial Small Business Climate Action Account (up to 3%); and a Climate Investment Account (at least 67%), with the last one having particular focus on disadvantaged communities