Pragmatic Environmentalist of New York Summary Update May 13, 2024 to May 26, 2024

This is my fortnightly summary update of 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 recent posts with minimal technical jargon but includes links if you want to read the entire post. 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.

Graduation Speech Essay You Need to Hear has Climate Response Implications

I think this marvelous Robert Parham essay deserves wide distribution. Please read it. It addresses the mis-placed pessimism of students in colleges today. This post addresses the parallels between his college concerns and the environmental movement.

My takeaway from Parham's speech is that things are much better than portrayed by many academics. "There is still (much) room for progress, but things are currently better than they've ever been, and improving fast." That sentence sums up the status of the environment in the US. There are environmental issues that still need to be addressed. However, the health of the environment has never been better in this country. There has been tremendous improvement over the last 40 years.

My concern is that, as is the case with the academic focus on pessimism, there are those who ignore environmental improvements and focus on current much smaller environmental risks all the while ignoring the benefits of a reliable electric system. The peaking power plant issue is a prime example. Even though direct emissions from New York City peaking power plants comply with all existing environmental regulations, activists claim that they are the "most egregious energy-related example of what environmental injustice means today." The activists paid a consultant to give them that answer and have been promoting the issue ever since. However, the presumption of egregious harm is based on selective choice of metrics, poor understanding of air quality health impacts, and ignorance of air quality trends.

Parham's essay stands on its own as a great message for today. The difference between a zero-sum society in which wealth can only be created by taking it from others, and a positive-sum society in which wealth is created by exchange is being improperly ignored. Worse academics are promoting the zero-sum concept to the detriment of their students.

In my opinion, I think there are zero-sum versus positive-sum environmental parallels. The United States has developed a comprehensive set of environmental standards and there have been unquestioned overall environmental quality improvements over the last several decades. The sum of benefits and costs are positive. Regarding emissions in isolation, focusing only on the negatives and disregarding any benefits is an approach like the zero-sum concept of wealth. It creates an unnecessarily pessimistic outlook, hinders growth, and could lead to unintended consequences.

Status of RGGI Third Program and Acadia Center RGGI Letter to State Officials May 23, 2024

The Acadia Center recently sent me an email asking if I would sign a letter to State Officials regarding the Regional Greenhouse Gas Initiative (RGGI) Third Program Review. That prompted me to prepare this article that summarizes the status of the Third Program Review and describes my response to the Acadia Center. RGGI is a market-based program to reduce greenhouse gas emissions that has been in place since 2009. The regulations include regular programmatic reviews of the status of the program. The current review is running late.

I agree with the concepts in the Acadia Center draft letter to State Officials. An update on the status is overdue and responses to comments are appropriate. However, I don't think the status update is going to satisfy anyone because of all the uncertainties that preclude a firm schedule. Until the differences between Virginia and Pennsylvania participation and RGGI state policy differences are reconciled it is impossible to respond to the proposed letter. Therefore, I do not plan to sign the letter even if I am still welcome after this article is published. **Update** – several days later and I have not received a response.

My primary concern with RGGI relates to its underlying goal of CO2 emissions reductions while maintaining a reliable and affordable electric system. The Acadia Center letter and most of the comments submitted last year were notable with respect to the motivations of the authors and the complete disregard of the emission reduction goal. There is a faction that despises a biomass facility in Vermont and commented on that. Emissions traders support revisions to their advantage and not the rest of us. One comment was a blatant marketing proposal to get funding, but it could be argued that many other commenters were doing the same thing just less obviously. In fact, I suspect that the reason the Acadia Center is lobbying for action is that with everything on hold they cannot charge clients for services regarding RGGI.

The RGGI States narrative now is to incorporate environmental justice considerations and comments supporting that were frequent. In the post described above I addressed the tradeoffs between equity in a zero-sum approach relative to a positive-sum approach. All the comments supporting environmental justice equity promoted the zero-sum approach with no recognition of potential unintended consequences. I think the well-meaning emphasis on environmental justice is a problem because advocates are unduly pessimistic because that suits their purpose. They ignore current environmental quality and improvements and focus on much smaller and less certain environmental risks all the while ignoring the benefits of a reliable electric system.

I am not surprised that the RGGI states have not been able to proceed with the Third Program Review. I do not think it is possible to submit a letter that will accelerate the process given the complexity of the issues and all the uncertainties. The Acadia Center draft letter requested that the RGGI states "respond, from a substantive point of view to the comments you solicited, and we provided." Given the wide range of possible outcomes and disparate interests of the states I do not think that they will be able to respond to the comments now.

New York Assembly Cap and Dividend Naiveté

With all due respect to politicians, the idea that they can manage electric energy planning and environmental regulatory policy better than the subject matter experts accountable for those responsibilities is crazy. No where is this more evident than legislation proposed to supplement nd improve New York's Cap-and-Invest (NYCI) program. This article evaluated Assemblyperson Anna Kelles bill to "amend the environmental conservation law and the public authorities law, in relation to establishing an economy-wide cap and invest program to support greenhouse gas emissions reductions in the state". I addressed the arguments raised when Susan Arbetter interviewed Kelles about her legislation on Capital Tonight.

I addressed each of the points raised during the interview in this article. The fundamental flaw in the Climate Act is the presumption by its authors that getting to net-zero emissions was only a matter of political will. There never has been an open and transparent feasibility analysis to clearly account for the necessary costs and threats to system reliability. All indications are that the net-zero transition cannot work on the schedule outlined in the Scoping Plan.

On the other hand, the NYCI rule proposal builds on the existing RGGI model. That program has shown how a cap-and-invest program can ensure compliance and raise money for investments fairly. The Kelles legislation ignores the factors that made RGGI work and eliminates many. That will ensure that the program does not provide any pretense of cost-effective reductions.

The presumption of the Hochul Administration and the Kelles legislation is that a cap-and-dividend program will work as well as previous programs. I think the real debate should be whether that is a justified position because I think the differences between the ambition of this program and previous programs is far greater. When the results of previous programs are considered the odds that NYCI will work as hoped are not very good.

Roger Pilke, Jr – Bullish on Solar

I have great admiration for Roger Pielke, Jr. and his work on addressing climate change. However, his recent post explaining why he is bullish on solar is not up to his usual standards. This post explains why I disagree with his optimism for solar in the context of New York's net-zero transition.

Pielke's optimism for solar neglects key considerations. There are geographical areas and niche applications where it may make sense to rely on solar. New York's high latitude and cloudiness is one location where it does not. His arguments for solar cheapness ignore the expensive challenge to integrate solar energy into the electric grid when and where it is needed. Full consideration of the ancillary services requirements suggests that it will not be simple either. When enormous tracts of land are covered up with solar panels, I think that its popularity will wane.

Grid Planning to Meet Climate Act Goals Summary
Grid Planning to Meet Climate Act Goals Documentation
I spent a lot of time documenting the Alliance for Clean Energy New York (ACENY) webinar "Grid Planning to Meet Climate Act Goals" that addressed the upgrades to the electric transmission system needed to achieve mandates for a zero-emissions electric grid by 2040. The full documentation was so extensive that I prepared a summary highlighting specific points in the documentation.

On April 11, 2024, the Alliance for Clean Energy New York (ACENY) hosted a webinar entitled "Grid Planning to Meet Climate Act Goals" that was recorded on a video. The webinar featured speakers from the Department of Public Service (DPS), New York Independent System Operator (NYISO), and National Grid. Each of the speakers provided very good background information on New York's transmission grid planning process and how they hope that it will work for this transition. The posts include slides with links to the appropriate sections of the video discussing each topic.

The webinar identified wind, solar, and energy storage technical issues related to differences between those technologies and existing resources affecting transmission. While those technological issues are concerning the bigger issue is the scale of the transmission upgrades and additions needed. New York has already committed $6 billion to start "unbottling" renewable resources which is code in New York for Upstate utilities paying for support for New York City access to renewables. New York also has plans for three major bulk transmission projects to get hydroelectric power from Quebec, another to collect the energy from part of Upstate to New York City, and the third to start the process of connecting the expected 9 GW of offshore wind into the grid. Nobody has admitted to the total expected costs.

The other New York problem that I suspect is common elsewhere is that the politicians who enacted these net-zero laws were more concerned with the optics of aspirational timelines and not the feasibility of those schedules. A question about longer planning processes planning and deployment timing made the point that the NYISO resource adequacy process that identifies specific need for transmission development, New York's de-regulated market process to propose, bid, and choose the development, and the project planning, permitting, and construction plans development which all need to be completed before construction can begin takes a lot of time. Reading between the lines all the speakers are highly skeptical that the artificial deadlines of the Climate Act can be achieved.

One final point not addressed in the webinar but certainly affecting the viability of New York's energy transition goal is the decarbonization of heating and transportation. That is going to require a complete rewiring of the distribution network.

My impression of the speakers at this meeting is that they were desperately trying to make the point that the transmission challenges for the Climate Act mandates, and schedule were impossible goals without actually saying that. I believe that all the technical people who really understand the electric grid in the DPS, NYISO and the electric companies are being held hostage to the political narrative that "All is well". That did not work out for Kevin Bacon in Animal House and it won't work out here either.

I concluded that the magnitude, costs, and technical challenges of the generation and transmission electric grid transition ensure that that there is no question that New York will hit the Green Energy Wall. The Hochul Administration has not provided a feasibility analysis that includes the expected costs, ensures that current reliability standards can be maintained, and documents the cumulative environmental impacts of the generation resources and the transmission and distribution deployments for the electric system to meet the 2030 70% renewable energy mandate. The fact that no jurisdiction anywhere has developed a system that depends on wind and solar as in the proposed New York system suggests that a proof-of-concept demonstration is appropriate.

NY HEAT is not so hot

According to New York climate activist non-governmental organizations, New York is "failing to lead on climate." These organizations are lobbying very hard for the New York Home Energy Affordable Transition Act, or NY HEAT, legislation currently being considered in the Legislature. This post documents several op-eds that argue this legislation not a good idea.

On Sunday May 12, the New York Daily News published pieces by NY State Senator George Borrello and one co-authored by Richard Ellenbogen and myself. Last week Dennis Higgins had another opinion piece published by All Otsego.

Senator Borrello's paywalled opinion in the New York Daily News was titled: Don't raise the N.Y. HEAT Act: He explained that we have to be honest about energy costs. He argued that the claims for cost savings ignore "the costs to New Yorkers that will come with a mandated conversion to an all-electric future for the state." He concluded that:

> The reality is that the most fervent advocates of New York's aggressive climate agenda believe that no cost is too great to address the climate crisis. That is why they misrepresent the facts and mislead New Yorkers into believing a transition to all-electric will save them money. The truth is that New Yorkers are in for a far costlier and less reliable energy future if proposals like the HEAT Act are adopted.

Rich Ellenbogen and I had an op-ed published next to the Senator's. The title of our paywalled piece was "Don't raise the N.Y. HEAT Act: It threatens the safety of all New Yorkers". We pointed out that until questions regarding the legislation's feasibility, affordability, and reliability are answered, the HEAT Act should be allowed to lay dormant. We concluded that:

> The shortcomings of the HEAT bill are to some extent a product of its authors' faulty assumptions, but they are exacerbated by the even more unrealistic and unachievable goals built into the larger Climate Law. Until these issues are properly addressed, we should set aside the HEAT bill because it will simply make a bad situation worse.

Dennis Higgins article in the All Otsego Partial Observer was titled HEAT Act Nothing But a Hot Mess. He explained that "NY HEAT, like its Climate Leadership and Community Protection Act launch pad, runs counter to sound engineering and responsible fiscal policy." His article described the effort required to install the required heating equipment and the effects on the grid when residential heating is forced to

go electric. To compound the problem the state is proposing to shift to wind, solar, and energy storage resources without addressing many issues. All this adds up to enormous costs. Higgins concludes:

> It continues to be a mistake to let political appointees and Big Green organizers craft energy policy. CLCPA and NY HEAT do not meet the fiscal or engineering standards needed to shape a reliable, carbon-free grid.

Articles of Note May 26, 2024

I see many articles that I think would make a good post that would be of interest to my readers, but I do not have time to address them all. This post listed articles that I did not get to.

Videos

- Steven Koonin: Stop POLITICIZING Climate Science!
- Good electric system overviews. If you want to know more about how the system works I recommend these
  - How the Hawaiian Electric Grid Works
  - Connecting Solar to the Grid is Harder than You Think
- Electric vehicle issues overview

National Grid announced their plans to "invest an estimated $75 billion across the company's service territory in the UK and US over the next five years, with nearly half of the funding dedicated to US energy system improvements in Massachusetts and New York."

Ron Clutz's summary of Robert Bryce's article on last year's wind energy includes some hilarious cartoons. Bryce found that "Weather-dependent generation sources are…weather dependent: Last year, despite adding 6.2 GW of new capacity, U.S. wind production dropped by 2.1%."

I admire the work of Robert Bryce. In this post he argues that concerns for the environment that "once aimed to protect landscapes, wildlands, whales, and wildlife — has morphed into the NGO-corporate-industrial-climate complex. Rather than preserve wildlands and wildlife, today's "green" NGOs have devolved into a sprawling network of nonprofit and for-profit groups aligned with big corporations, big banks, and big law firms" pushing "climatism and renewable energy fetishism."

This summary of the rule explains: "The Environmental Protection Agency (EPA)'s ecently finalized Clean Power Plan 2.0 (CPP) rule, however, takes the country in the wrong direction. Under this regulation, one that is arguably illegal, existing coal and new natural gas power plants will be mandated to install emissions control technologies that aren't yet commercially viable."

Gail Tverberg notes that "Energy and the economy work together in very strange ways" in her recent article about offshored industrialization. This article notes that: "Industry is based on the use of fossil fuels. Electricity also plays a role, but it is more like the icing on the cake than the basis of industrial production." and goes on to argue that "The feasibility of moving away from fossil fuels without killing off a very major portion of the world's population seems to be virtually zero."