



December 7, 2022

Hon. Basil Seggos
Commissioner
NYS Department of Environmental Conservation
625 Broadway, 14th Floor
Albany, New York 12233-1010

Hon. Doreen Harris
President and CEO
NYSERDA
17 Columbia Circle
Albany, New York 12203-6399

RE: Climate Action Council Draft Scoping Plan

Dear Commissioner Seggos and President Harris:

Thank you for your recent response to the Capital Region Chamber's comments which were submitted on May 12, 2022, regarding the above referenced matter. While I appreciate your response, I respectfully disagree that the concerns of our Chamber have been addressed during multiple Climate Action Council (CAC) meetings. Although several of our concerns have been discussed during these meetings, we have yet to receive detailed information from the state that would allay our concerns.

Regarding our concerns related to costs, to my knowledge the state has not provided information on the specific impacts and costs associated with each proposal. Although, CAC's Integration Analysis suggests that costs for individuals to convert homes to a zero emissions environment will be \$20,000 to \$50,000 for a single-family home in the Upstate New York region, I am unaware of any further information that the state has released regarding costs associated with other proposals. The CLCPA (Climate Leadership and Community Protection Act) requires the state to evaluate the total potential costs of the Scoping Plan, particularly the costs of implementation. Although several stakeholders, including our Chamber, have requested this information, the state has yet to provide a comprehensive evaluation of the practical cost impacts of the state's energy transition on individuals, businesses, and industries in New York. As I have previously indicated, the public cannot make an informed analysis of the Draft Scoping Plan without access to this critical information.

As to our concerns related to the reliability and resilience of the state's energy supply, I am unaware of the state's plan to ensure both. In fact, the New York Independent System Operator (NYISO) recently stated that "The scale of new resource development needs to satisfy system reliability and policy requirements within the next 20 years is unprecedented." NYISO has made clear that the requirements under CLCPA will increase peak and annual demand overtime and will require an unparalleled level of investment by the state. Specifically, NYISO points out that without investment in transmission, certain regions of New York "will experience persistent and significant limitations" to deliver renewable power. NYISO further states that long-duration, dispatchable, and emission-free resources needed to maintain reliability while meeting the requirements of CLCPA are not commercially available at this time. I respectfully request the state provide our Chamber with specific information related to how the state will ensure the continued reliability and resilience of our energy supply as the state seeks to make this unprecedented energy transition.

To be clear, the Capital Region Chamber supports efforts to reduce the carbon intensity of our economy and fully appreciates the health benefits associated with various proposals contained within the draft plan. Unfortunately, without the information requested, our concerns regarding the Climate Action Council Draft Scoping Plan remain.

Thank you in advance for your consideration and I look forward to receiving a more detailed response to our Chamber's comments and concerns.

Sincerely,

A handwritten signature in black ink that reads "Mark N. Eagan". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Mark N. Eagan, CCE
President and CEO

cc: Capital Region Legislative Delegation

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