



November 14, 2024

New York State Energy Planning Board
State Energy Plan Comments
NYSERDA
17 Columbia Circle
Albany, New York 12203-6399

RE: Draft Scope of the New York State Energy Plan

Dear Members of the New York State Energy Planning Board,

On behalf of the Capital Region Chamber, I am writing to provide our comments on the *Draft Scope of the New York State Energy Plan*. The Capital Region Chamber represents 2,600 businesses and organizations from throughout the Capital Region that employ more than 150,000 area residents. As New York State considers its long-term energy plan, it is critical that any such plan include a focus on an “all-of-the-above approach” and on maintaining a secure, reliable, accessible, and affordable energy supply for business and residential consumers.

As you are aware, New York State consumers pay some of the highest energy prices in the nation. Converting to all-electric is without question an expensive proposition and there is a real danger that transitioning to an all-electric economy could negatively impact the security, reliability, and affordability of our state’s energy supply. Renewable sources alone cannot meet the state’s energy demands. Reliance on an all-electric system that is completely dependent upon renewable energy will cause system failure when supply does not meet demand, and alternative sources have been abandoned. It is imperative that any energy plan that transitions the state to a clean energy future does not undermine energy security and reliability, does not hinder economic growth, and does not increase consumer costs.

Our Chamber has long supported energy policies that promote access to affordable and reliable energy, protect energy consumers, and produce meaningful environmental progress including the reduction of our economy’s carbon intensity. Unfortunately, the state’s current energy plan, which has been based upon the Climate Leadership and Community Protection Act (CLCPA) and the resultant Climate Action Council’s Final Scoping Plan do not meet each of the above-mentioned goals. Furthermore, the state’s current energy plan and its accompanying goals have been proven to be unattainable in terms of timeframe, cost, and feasibility. The state has now acknowledged that it does not expect to meet two of the CLCPA’s principal mandates - 70% renewable energy generation and 40% greenhouse gas emission reductions by 2030. Considering these shortfalls, it was encouraging that during the state’s recent “Future Energy Economy Summit” in Syracuse, Governor Hochul, as well as several panelists, highlighted the fact that an “all-of-the-above approach” will be essential to realistically achieving the goals of any energy plan. It is with this in mind that we offer the following recommendations.

The New York Energy Plan:

- Must be a consumer-focused energy transition targeted at lowering emissions, while maintaining cost, consumer choice, and ensuring continued access to multiple energy sources;
- Must be an “all-of-the-above approach” which promotes innovation. To ensure consumer choice, energy reliability, affordability, security and redundancy, more options should be included. These options should include, but not be limited to, wind, solar, natural gas, renewable natural gas, nuclear, and green hydrogen;
- Must expanded energy efficiencies;
- Must ensure that each plan provision undergoes deep analysis to determine achievability, reliability, and affordability, before inclusion. Such analysis must be fully disclosed, transparent and incorporated into the plan. The public cannot make an informed analysis of the plan without access to this critical information;
- Must devote more attention to grid resiliency and redundancy;
- Must provide for existing gas networks to be retained, maintained, and upgraded to ensure that NG, RNG and hydrogen continue as options. Policies that abandon NG will inhibit the growth and attraction of manufacturers that do not have an alternative to natural gas, which will lead to potential job loss or missed opportunities for job creation. This is a particular concern given the state's successful efforts to be the world leader in semiconductor manufacturing and Artificial Intelligence.

While our Chamber supports efforts to reduce the carbon intensity of our economy, we believe that the state’s energy policies must adopt an “all-of-the-above approach” to ensure access to secure, affordable, and reliable energy, protect energy consumers and their choices, and provide meaningful environmental progress. I respectfully request that you consider our Chamber’s perspective and proposed recommendations to improve the current Energy Plan.

Sincerely,



Mark N. Eagan, CCE
President and CEO

**UNITED TO DRIVE ECONOMIC PROSPERITY WITH
ONE VOICE, ONE MISSION, ONE REGION.**

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