

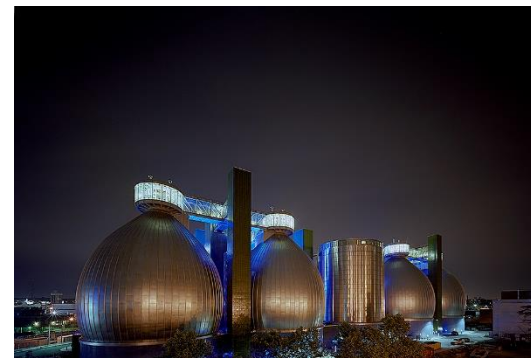
# New York's Gas System Can Help Overcome Decarbonization Challenges

*The Climate Action Council's Draft Scoping Plan calls for substantial downsizing and decommissioning of much of the gas system, with virtually no mention of the ability of that system to play a constructive role in the implementation of the Climate Leadership and Community Protection Act (CLCPA). Rather than recommending decommissioning substantial portions of the gas system that supplies 35 percent of the state's energy while decarbonization technologies are being deployed and evaluated, the Utility Consultation Group (UCG) makes the following recommendations:*

- A pathway that leverages existing gas infrastructure investments to achieve decarbonization is likely to be a more cost-effective, lower risk way to achieve emissions reductions called for by the CLCPA, while supporting overall energy system reliability.
- The gas system is already helping the state reduce greenhouse gas (GHG) emissions and should play an integral role in overcoming the implementation challenges of decarbonization. While the Climate Leadership and Community Protection Act (CLCPA) GHG emissions targets will require a significant transformation of New York's energy systems and customer energy usage, there must be a focus on maximizing the efficiency of gas consumption while leveraging existing infrastructure to flow lower and zero carbon alternatives.
- The State's first focus in the gas transformation effort should be on increasing the efficiency of customer energy use, including gas use. Using existing gas networks to help meet CLCPA emissions targets will also require decarbonizing the energy sources that flow through the gas system, understanding geographical and regional differences – including differences between upstate, downstate, rural and urban areas, and coordinating the optimization of gas system use with the electric system to ensure service reliability and promote emissions reductions in a way that most benefits the State and its residents.
- Taking steps to eliminate emissions is one of the most impactful ways the State can mitigate climate change. Many efforts underway today by gas utilities reduce or eliminate leaks. For example, safety investments in the system have increased public safety while also dramatically reducing emissions and should be continued.

***“Making use of the [US natural gas pipeline] infrastructure already in place could offer a prime route for speeding up and cost-effectively making the considerable changes needed to fully decarbonize the energy sector – while also enabling a just transition for communities that have invested in and rely upon these systems.”***

*Columbia University's Center on Global Energy Policy*



*Newton Creek Wastewater Treatment Plant  
Credit: NYC DEP*

- The clarity around the definition of Disadvantaged Communities (DACs) that is emerging from the Climate Justice Working Group is appreciated. Many UCG members are already evaluating the DAC census tracts and how existing and new programs can target these areas and customers.
- The biogenic origins of sustainably sourced renewable natural gas (RNG) should be recognized for their benefits to the environment as they do not increase global warming. They provide a market for a bioeconomy and enable large emissions reductions of GHGs from current agricultural waste sources. The use of sustainable RNG in the transportation, industrial and building sectors does not increase the State's GHG emissions and the CO<sub>2</sub> portions of these emissions should hold no value.