

December 3, 2021

VIA ELECTRONIC MAIL

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CC: Climate Action Council members

**RE: Comments of the Utility Consultation Group
in anticipation of the draft Scoping Plan**

Dear President Harris, Commissioner Seggos, and Executive Director Osgood:

On behalf of the Utility Consultation Group (UCG),¹ please accept the following comments in anticipation of the Climate Action Council's (CAC) issuance of its draft Scoping Plan. The UCG members support the achievement of the emissions limits and benefits for disadvantaged communities that are included in the Climate Leadership and Community Protection Act (CLCPA). UCG members operate the very complex and technically sophisticated energy systems that reliably and cost effectively deliver the power our customers need today, and believe that our collective technical and operational experience will be critical in delivering the cleaner energy our customers will need in the future. In that spirit, the UCG offers its expertise and perspective on the important issues being considered by the CAC as it develops the draft Scoping Plan that will help guide New York's energy transformation. Our comments are organized by Scoping Plan chapter, as those chapters were identified on slide 96 of the October 14, 2021 presentation to the CAC.

¹ For purposes of these comments, the UCG includes the following: The Brooklyn Union Gas Company d/b/a National Grid NY; Central Hudson Gas & Electric Corporation; Consolidated Edison Company of New York, Inc.; KeySpan Gas East Corporation d/b/a National Grid; Municipal Electric Utilities Association of New York State; National Fuel Gas Distribution Corporation; New York State Electric & Gas Corporation; Niagara Mohawk Power Corporation d/b/a National Grid; Orange and Rockland Utilities, Inc.; and Rochester Gas & Electric Corporation.

Electricity

- CLCPA sets ambitious climate goals that require transformational, multi-faceted action. Electricity sector actions are foundational for success in the transportation and buildings sectors. Maintaining system reliability, while increasing both transmission and distribution system capabilities, will be critical for the success of the final Scoping Plan. The electric grid has been called the single greatest engineering achievement of the 20th century, and is an incredibly complex and highly integrated system. UCG members will bring their full capabilities and expertise in this area to achieve the transformation needed.
- The CLCPA’s targets are clearly ambitious when compared to the State’s past renewable adoption.
 - In the 15-year period between 2003, when the State’s renewable portfolio standard was established, and 2019, renewable generation in the state increased from approximately 19 percent of the total generation to approximately 29 percent. In this decade, in order to achieve the 2030 Climate Act target of 70 percent renewable electricity, the State will need to install four times as much renewable generation as was built in the previous 15 years.
- Customers expect that **system reliability** must be maintained during the transformation, and so it must be achieved by looking at the entirety of the energy system. Reliable and resilient energy systems are the foundation upon which the clean energy system of the future will be built.
 - As we electrify portions of our energy system that currently rely on other sources of energy, system reliability will only become more critical. The utilities understand that any loss of reliability causes immense human harm, and how the pain disproportionately effects the most vulnerable, who are less able to afford generators, lost work, or other mitigation measures.

NY and its utilities should develop a master plan to optimize its entire energy system, by analyzing approaches for planning an overall energy system that optimizes across generation, electric distribution, gas distribution and demand-side management, and evolves them together to achieve the transformation. Other countries have experience in this comprehensive approach to whole energy system optimization, which enhances reliability and mitigates costs.²

² [Hydro-Québec and Énergir: An unprecedented partnership to reduce greenhouse gas emissions | Hydro-Québec \(hydroquebec.com\)](#)

- This transition to zero emissions generation should also **be affordable**
 - One recognized challenge with a predominately renewable, zero emissions grid is providing the firm power to complement renewables' intermittency. NYSERDA's modeling shows and the Power Generation Advisory Panel acknowledged that some **dispatchable generation** will be necessary. There is no obvious/agreed upon answer today for filling that gap. Batteries do not yet offer enough capacity and/or duration, and other technologies are costly, new, operationally challenging, still under development or have not even been considered yet. That landscape indicates we should immediately begin planning and fostering new technologies so that they can be available at the lowest cost to customers in time to meet 2040 and 2050 goals.
 - Whether distributed or large-scale, it is clear that additional infrastructure will be needed to meet the demands of a cleaner, bigger electric network. The state should recognize and plan for these infrastructure needs, while looking at the entirety of the energy system to ensure the most cost-effective approach.
 - The state will generally benefit from the declining cost of renewables. One way to lock in long-term savings would be to allow utility ownership of renewables, which allows customers to benefit from the asset for longer than a traditional REC contract allows.
- Given the concern about reliability, affordability, and meeting the CLCPA's targets, the State should **take several actions**, including:
 - The CAC's recommendations should support building bulk and local transmission and reinforcing distribution systems.
 - The UCG encourages the use of the Power Grid Study³ findings to build and upgrade transmission that will integrate renewable power, move it throughout the state, deliver it to customers, and help mitigate congestion and curtailment.
 - As a next step, the Public Service Commission can expedite approvals for the "Phase 2" projects needed to meet the 70x30 Climate Act targets identified by some of the UCG members in their studies. The two bulk transmission studies completed by consultants to DPS Staff and NYSERDA explicitly rely on the timely completion of the electric utilities' local projects in order to fully realize the value of new bulk transmission investments and renewable generation.

³ NYPSC Case 20-E-0197, Initial Report on the Power Grid Study (January 19, 2021).
<http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7bE41D6A17-1EA5-47D3-90E8-A4E981705FE3%7d>

- Work with the utilities to: (i) develop a regulatory framework to accommodate build-out, including advanced and mid-rate period, of infrastructure at all levels of the delivery system to meet the needs of a rapidly electrifying transportation system, and (ii) assess the impacts of heating / transportation electrification on electric distribution and transmission systems.
- Reducing sources of emissions today. The Power Generation Advisory Panel has correctly identified the importance of continuing to **reduce methane leakage**. As noted below, UCG members have robust efforts underway to reduce methane leakage from gas distribution systems, which include financial support for making the investments needed to replace leak-prone pipe.
- The State should continue to support these emissions reduction programs. The State could further accelerate CO2e reductions in this area by authorizing and providing earnings incentives for gas and steam utilities to reduce emissions from their operations and procure low-carbon fuels during the transition (supplies may initially include certified gas and RNG, with increasing emphasis on the lowest carbon options).
- Support research and development for technologies that will result in dispatchable forms of zero-emissions generation in order to ensure energy reliability.

Buildings

- The UCG urges that Scoping Plan recommendations for Residential and Commercial Buildings must be **viewed from the perspective of the customer**:
 - In order to achieve deep energy efficiency retrofits and electrification, customer acceptance and barrier removal are critical
 - An orderly and equitable transition requires that heating customers are part of the state's transition to net zero, and providing customers with options to meet their heating needs while progressing towards CLCPA's emissions limits
 - National Grid's recent analysis of Heating Decarbonization shows a **\$900 annual savings to residential customers with hybrid heating** in 2040 (as compared to 'all electric' heating)
 - National Grid's analysis further shows a **\$1,300 annual savings to residential customers with decarbonized gas heating**
 - Also, UCG supports steps to lower costs of near-term customer adoption of no-carbon and low-carbon technologies

- Provide incentives to support energy efficiency, electrification, air-source heat pumps, hybrid heating systems (i.e. heat electrification relying on electric air-source or ground-source heat pumps and adding low-carbon gas when it is severely cold), and other no-carbon and low-carbon measures
 - Encourage the state to support efforts that lower energy costs, such as modifying the property tax treatment of utility infrastructure investments, and utility ownership of shared ground loops
- Further study is needed on whether and how older buildings may be retrofitted to accommodate electric heating, of which upfront conversion costs can be expensive, and a barrier for LMI customers and property owners in disadvantaged communities
- Policies that limit or eliminate access to natural gas should be thoroughly analyzed, particularly in light of unintended burdens on LMI customers, whereas increased support for energy efficiency provides LMI households with more affordable and healthier homes
- The UCG recommends that the Scoping Plan call for further study:
 - Assumptions of electrification adoption curves for housing
 - Utility analysis shows, at organic turnover rates of 5%/year, an ‘all Electric’ scenario risks missing adoption goals by 40% by 2050
 - The *Pathways to a Carbon-Neutral NYC* study, a joint project from the NYC Mayor’s Office of Sustainability, Con Edison, and National Grid, showed that 40% to 70% of the buildings in New York City would likely not be electrified in 2050
 - Approaches to reduce adoption costs to consumers, particularly LMI customers
 - Approaches to reduce electricity network costs to meet higher winter heating demand
 - The *Pathways* study found that inclusion of hybrid heating systems in a decarbonization pathway could substantially reduce the costly impacts on electricity networks from higher winter heating electricity demand

- Using NYSERDA’s Integration Analysis data in the full electrification scenario, utility analysis found that **an incremental 63 GW needed to meet the NYS winter peak could be avoided** using a hybrid pathway
- A “hybrid pathway” is defined as achieving net zero for heating via a combination of: building energy efficiency, electrification, dual-fuel gas/electric heating, and replacement of fossil gas by RNG/H2
- Using the approach from NYSERDA’s Integration Analysis for decarbonizing Transportation with procurement of low-carbon fuels (like RNG), the UCG recommends using the same approach of procuring low-carbon fuels for Heating
- The UCG recommends that NYS implement supportive measures such as a low-carbon standard (like that in California), or supplement its Clean Energy Standard with provisions for low-carbon fuels
- R&D and demonstration projects to advance the reduction of GHG from buildings should also include complementary focus on:
 - Decarbonization of the existing gas distribution system for use by low-carbon or no-carbon renewable fuels
 - Hybrid high-efficiency gas furnace/electric air source heat pumps, and hybrid solutions systems coupled with battery storage and/or fuel cell power capabilities
 - Benefits of increased energy system resiliency for emergency heat during weather events, by using a storm-resistant underground network
- The impact of the “electrify everything” scenario on the cost of new generation and associated electric transmission, and how this might discourage renewable development
- How renewable green hydrogen can supplement the gas network as a zero-carbon fuel
- Further hydrogen blending study to understand the details of delivering hydrogen through existing gas distribution networks

Gas System Transition

- Decommissioning of the natural gas system and singular focus on near-complete electrification is likely to be a less cost-effective path for consumers and would require significant additional investments to ensure energy reliability and resiliency.
 - Leveraging the existing, approximately 50,000 miles of gas delivery infrastructure to transport lower-carbon energy throughout the State can help mitigate costs associated with the build-out of electric infrastructure.
 - Greater reliance on renewable, intermittent electric generation resources, particularly in winter months when renewable output is historically low, will require dispatchable sources of energy to fill the gap and ensure reliability. Utilization of existing energy sources can support overall energy system reliability while progress is made to advance dispatchable, zero-carbon generation resources.
 - The gas distribution system should be maintained for safety and reliability. The increased frequency of severe weather events and the vulnerabilities of above-ground energy infrastructure can be addressed through various resiliency measures, including use of existing underground gas distribution systems that deliver low carbon fuels.
 - At this early stage of the decarbonization process, it is prudent to take a “no regrets” approach and keep options available to ensure a smooth transition from gas to increased electrification. This includes utilization of low-carbon fuels and advancing technologies such as geothermal.
- The gas distribution system should be utilized as a vital decarbonization tool, particularly (but not solely) for certain industries in the state that cannot electrify their operations or cannot do so in a cost-effective manner. Concerns around economic leakage should not be underestimated as New York pursues its energy transition.
 - Ongoing technological advances and studies will provide further support for the ability to use low- or zero-carbon resources in sufficient quantities.
 - Renewable natural gas (RNG) is a proven technology that can be used to provide carbon-neutral, and in some cases carbon-negative, energy to New Yorkers.
 - Utilities in New York (as well as several other states and countries) are currently engaged in a thorough review of the safe usage of hydrogen in their systems.
 - The State is already developing its hydrogen strategy in concert with the National Renewable Energy Laboratory and the Center for Hydrogen Safety, among other groups.

- NYSERDA, New York's Stony Brook University and National Grid are coordinating on a hydrogen demonstration project.
 - The U.S. Department of Energy has allocated more than \$10 million to support an industry collaborative, the HyBlend project, to fund accelerated research on blending hydrogen into natural gas distribution systems.
- Emissions from the natural gas system itself continue their historical decline, and it will be an ideal vehicle for the transportation of low- and no-carbon fuels throughout the state.
 - The U.S. Environmental Protection Agency released its inventory of U.S. GHG Emissions and Sinks in 2021, which shows that at a national level annual emissions from the natural gas distribution system declined 69% from 1990 to 2019.
 - All of the major New York utilities have programs that contributed to these emissions reductions in New York. Since 2011 alone, the UCG members have reduced more than 400,000 metric tons of carbon dioxide equivalent emissions, with an average reduction of approximately 38%. The utilities will continue these programs, resulting in ongoing significant GHG emissions reductions over time, as well as increasing safety and system reliability for customers.
 - New York's utilities replace more than 500 miles of leak-prone pipe (LPP) annually, consistently survey their systems to detect leaks, and have effective programs in place to evaluate, prioritize and repair those leaks in an appropriate and expeditious fashion. Many UCG members have started to prioritize fixing leaks which, even though due to their location do not have a safety impact, are sources of methane emissions. Some UCG members have installed methane leak detectors in customer premises to detect any leaks earlier, increasing safety and eliminating sources of methane emissions sooner.
 - Taking into account the robust pace of their system modernization programs, and the varying size and complexities of the utilities' systems, a majority of the utilities estimate that **all of the leak prone pipe on their systems will be replaced in the years leading up to 2030**, with the remaining utilities completing that process well prior to the anticipated attainment of the emissions reduction requirements of the CLCPA.
- Consideration of an equitable transition of the gas industry workforce is a top priority that can and should be mitigated by a recognition that gas delivery infrastructure can be transitioned to meet the emissions reduction targets of the CLCPA.
 - These energy workers can utilize their expertise to operate the existing underground infrastructure as it transports fuels like RNG and hydrogen.

- The currently available jobs study findings do not address if new jobs associated with solar, offshore wind and similar technologies will offer similar compensation and benefits for these experienced energy workers.

Transportation

- Because emissions from transportation are the largest source of greenhouse gas emissions in the State, decarbonizing the transportation sector is critical in meeting the CLCPA targets.
- Many UCG members already play a key role in administering electric charging infrastructure programs that help offset upfront capital costs and ongoing operational costs related to electric vehicle (EV) charging; for example, through providing incentives for light-duty vehicle charging station make-ready infrastructure and per plug operating cost incentives for direct current fast chargers (DCFC). Some UCG members also offer pilots and programs that encourage beneficial charging behavior, incentivizing customers to charge their vehicles at off-peak times to manage impact on the grid.
- Electric utilities incorporate EV charging infrastructure forecasts into their annual capital planning processes and are properly situated to connect EV charging developers with site hosts to facilitate well planned and cost-effective build out of chargers. Many of the utilities currently provide load serving capacity maps as a tool to developers which, through collaboration with utility experts, can help identify prospective site locations where utility and customer infrastructure upgrade costs may be lower. These sort of collaborative utility and industry partnerships are essential to facilitate the robust infrastructure build described in the transportation recommendations.
- The UCG agrees that substantially more investment in charging infrastructure will be needed to meet the goals of the CLCPA, as well as the targets of the 2020 medium-duty and heavy-duty (MDHD) ZEV memo of understanding. Many UCG members are already providing support to encourage EV charging station development. Through the light-duty make-ready program, which the Governor recently announced is permanent through 2025, electric utilities are providing \$480 million in incentives to support the installation of approximately 54,000 Level 2 chargers and 1,500 DCFCs statewide by 2025.
- To support EV charging development at the pace necessary to meet the statewide goals, additional funding is needed to help incentivize deployment. With the NYSERDA Charge Ready rebates program closed and the industry facing higher costs, it is critical that the state identify additional funding necessary to sustain a vibrant marketplace that can enable the electrification of the transportation sector.
- The UCG recognizes the need for a comprehensive cross-sector transition to electric transportation. In addition to the current make-ready program and to meet the state's broader transportation electrification targets, utilities should be supported to propose new and expanded programs to meet the needs of New Yorkers and accelerate adoption.

Specifically, utilities need the ability to incentivize adoption across all transportation sectors in addition to light, medium and heavy duty vehicles, including marine, aviation and micro-mobility sectors, and across all customer segments, such as providing make-ready incentives to support the needs of residential and fleet customers.

- Electric utilities are offering smaller MDHD make-ready pilots to support the transition of these larger vehicle classes and transit authorities. The UCG would be amenable to expanding charging infrastructure-related investments in the MDHD sector so as to enable reductions in localized pollution and noise, particularly in disadvantaged community areas where such vehicles are concentrated and, further, in order to more adequately stimulate this segment of the market.
- The UCG recognizes that some medium- and heavy-duty vehicles may be difficult to electrify and support the use and development of hydrogen and biofuels to decarbonize this challenging sub-sector.
- To encourage flexible grid use, which is important as more renewables come on the grid, the UCG recommends managed charging programs that incentivize and encourage EV owners and charging station operators to minimize their impact on electric system peaks by managing their charging behavior.
 - The CAC should incorporate the deployment of managed charging strategies and technologies. At present, many utilities offer, or will soon begin offering, passive, behavioral and actively managed charging pilots and programs that encourage moderation of charging load while providing incentives to customers that charge their vehicles at off-peak times.
 - The UCG believes that active, behavioral and passive managed charging programs which enable utility control have promise and should be considered. Managed charging is a developing area that can help to maximize the benefits for the customer and the grid by making it easier for them to manage their energy use and participate in optimization.
 - Utility innovation should be paired with the opportunity for earnings pathways, such as earnings adjustment mechanisms (EAMs).
 - Utility offerings should allow for exploration of the viability of different interactivity modes between use of vehicle battery for transport and for other uses to allow customers to better manage their use and allow for load management for the benefit of the grid.

Industry

- The UCG notes that certain industries may find compliance with the emissions reduction requirements of the CLCPA challenging. For example, some industrial processes may be difficult or impossible to electrify at all and/or in a cost-effective manner. For those industries it is important to emphasize increasing adoption of energy efficiency measures and the utilization of hydrogen, other low-carbon fuels and carbon capture, use and storage to facilitate emissions reductions in accordance with the statute.
- Because many of these industries are highly sensitive to increases in cost, the Scoping Plan should be sensitive to the impact of any requirements that could result in the leakage to other states that have less stringent emissions reduction requirements.

Agriculture and Forestry

- Together, the agriculture and forestry sectors provide enormous economic benefits to New York State. The New York agricultural industry employs over 55,000 people and generates over \$5 billion annually. New York forest industry employs more than 41,000 people and generates \$13.1 billion in direct output annually.
- In a zero carbon New York economy, agriculture and forestry sectors offer substantial carbon sequestration and economic development potential.⁴ The potential is multi-faceted, including agriculture and timber economic development for all of New York State, and increased CO2 compliance optionality through enhancement of soil and timber sequestration.
- The current employment levels and economic impact in both sectors must be maintained, while creating new economic potential and jobs through sequestration expansion.

Economic Development

- Wood products may provide lifelong health benefits for those living in wood buildings, provide rural economic development opportunities, and facilitate increased value for forest land.
- A biomass action plan provides the opportunity to scale the benefits to health, water and air quality while also creating further value from low-grade products which can further create value in rural communities.

⁴ <https://woodproducts.ny.gov/economic-value-new-yorks-forest-resource>
<https://economic-impact-of-ag.uada.edu/new-york/>

- Establish a NY Tree Corp (or Climate Corp) to provide direct tree establishment and maintenance services to public and private landowners. Regionally-based Tree Corp would be provided with staff and equipment to establish and maintain seedlings at no or low cost.
- The definition of Disadvantaged Communities is under development but will include areas upstate. Improving the agricultural and forest economies of rural areas will enhance landowner benefits statewide.

Educational Partnerships

- New York State has several major community colleges, colleges and universities that specialize in agriculture and timber management. It is critical that the private and public sectors work collaboratively on demonstrations, economic development, new best practices in agriculture and timber management, research and development, and creation of both soil and timber management sequestration programs coupled with carbon fee program. Developing an agriculture and forest carbon bank would help finance forest carbon sequestration as an option that must be a high priority in the immediate near-term.
- Developing research agendas, identifying pilots and critical demonstration projects are key.
- Worker Development - Develop and support workforce development and training programs for both agriculture and forest sector workers to enable an increase demand in services to be met. Incorporate agriculture, forest carbon and forest carbon management into training programs and agriculture/forestry curriculums at the high school (e.g., BOCES) and college level.

Sequestration

- Avoided Forest Conversion - This effort focuses around legislative and state agency efforts to provide environmental protection support, tax incentives, and technical assistance for maintaining forest land.
- Avoided Agricultural Land Conversion - Avoided agricultural land conversion is noted as an enabling strategy because much of its sequestration potential can be counted through other initiatives (Soil Health, Agroforestry, Transportation, LULG, etc.)

Timing

- Sustainable biomass, soil sequestration and timber management and sequestration need to be near term priorities. They provide immediate economic development opportunities while also providing another CO2 compliance option that will lower overall New York compliance costs. A sustainable biomass feedstock action plan for 2050 hard-to-decarbonize products is too late.

Adaptation and Resilience

- While the Advisory Panel recommendations include a recommendation to “[e]nsure the reliability, resilience and safety of a decarbonized energy system,” they should also acknowledge the resilience benefits provided by the use of the existing gas distribution system as a means to achieve this recommendation.
 - As recognized by the UCG and multiple independent studies, including those performed by experts for the CAC, gas distribution systems can and should be utilized to transport low- and no-carbon energy to ensure energy reliability and resiliency and to contribute to the State’s emissions reduction goals.

How Can We Help?

- Utilities are committed and actively contributing to the clean energy transition.
 - New York’s utilities provide energy to over 13 million households, businesses, and government facilities. They employ thousands of workers with the good-paying clean energy jobs that the CLCPA aspires to create. The utilities partner with non-profits, unions, and SUNY in training tens of thousands of workers.
 - We are investing in our communities – For example, Con Edison is investing in the Reliable Clean City Projects, which will come into service in 2023 and 2025. The projects will provide “off ramps” to deliver renewable energy to NYC customers in locations currently supported by fossil generation, advancing environmental justice by enabling the reduction of emissions from fossil generation located in EJ communities.
 - The utilities have proposed “Clean Energy Hubs” to provide locations for offshore wind and other new resources to connect and deliver their power to NYC customers, aiding the state in efficiently meeting its goal of 9 GW of offshore wind by 2035.
 - The utilities are investing in research to yield solutions – Central Hudson, National Fuel, National Grid, and Con Edison are participating in the Low-Carbon Resources Initiative, a five-year research and development commitment focused on the advancement of low-carbon technologies for large-scale deployment.

The utilities offer our technical assistance to the CAC and hope to have greater opportunities to contribute our comprehensive knowledge of New York’s complex energy systems to the Scoping Plan development and implementation going forward. The UCG has a proven track record of emissions reduction and clean energy delivery and is committed to helping the State meet its climate goals while together ensuring a reliable, safe, affordable, clean energy future for our customers.

Sincerely,

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