



TESTIMONY OF JACKSON MORRIS TO THE NEW YORK STATE ENERGY PLANNING BOARD

SUNY College of Environmental Science and Forestry (ESF)
Syracuse
March 6th, 2014

Good afternoon, my name is Jackson Morris, I am Senior Energy and Climate Analyst at the Natural Resources Defense Council (NRDC), an international nonprofit environmental organization, with our headquarters here in New York State. NRDC has more than 1.4 million members and online activists, including more than 110,000 in New York State. Since our founding in New York in 1970, our lawyers, scientists, and other environmental specialists have worked to protect the world's natural resources, public health, and the environment. NRDC's top institutional priority is curbing global warming emissions and building the clean energy future.

For two decades, NRDC has worked to scale up renewable energy and energy efficiency in New York State as the key strategy for fighting global warming, protecting public health, lowering New Yorkers' energy bills and creating jobs. As the result of efforts by many stakeholders and policies adopted by the State, New York State has scaled up its clean energy efforts

considerably. A decade ago, New York State had just 48 megawatts¹ of wind power; today, after a decade of our successful Renewable Portfolio Standard program, we have 1.8 gigawatts of wind—more than 37 times more than we had—with some of the largest projects located right here in central New York. Just four years ago, New York State had minimal amounts of solar power installed; today, after the first phase of the NY-Sun program, not counting the many installations that occurred in 2013 we have nearly 200 MW and are finally in the top ten states for installed solar. And yet we have far to go before we realize our full potential for clean energy in New York State, and in the aftermath of Hurricanes Irene and Lee and Superstorm Sandy, we understand more clearly than ever how high the stakes are in the struggle to move away from fossil fuels to clean energy. So the conversations that we are having through the State Energy Plan process are crucially important, as will be the policies that New York State adopts moving forward.

I appreciate the opportunity to comment on the 2014 Draft New York State Energy Plan today. My testimony is broken out into four parts. At the outset, we'd like to thank NYSERDA for their efforts to produce a solid draft that synthesizes a lot of useful information about New York's current and projected energy mix, and includes some thoughtful recommendations. Moving forward, we urge New York State to include more explicit commitments to specific clean energy goals and policies. These will be needed to meet our emissions reduction, clean energy, environmental and public health goals.

¹ NREL 2004 Year End Wind Power Capacity map at http://www.windpoweringamerica.gov/pdfs/wind_maps/installed_capacity_2004.pdf

- I. **The Draft Plan includes a laudable long term emissions target—an 80% reduction in greenhouse gases by 2050—but needs more interim goals/mile markers to ensure we get there.**

New York should establish near- and mid-term targets, for 2018 and 2021, to help achieve the year-over-year economy-wide GHG reductions to meet Governor Cuomo’s long-term goals. For example, a 2018 target of a 14% reduction from 2011 levels and 20% by 2021 would ensure the state is on the appropriate glide path to reach the “80 by ‘50” goal.²

In addition, targets should be based on actual *carbon dioxide equivalent* reductions, NOT carbon intensity. The Draft Plan states “investments in clean energy strategies will help New York to reduce the intensity of its carbon emissions from the energy sector by 50 percent by 2030 (measured in CO₂ emissions per Gross State Product from 2010 baseline) putting New York on a pathway to achieve an 80 percent reduction in total emissions by 2050.”³ Instead, goals must be set in terms of actual tonnage reductions of CO₂ equivalent to provide an accurate measurement of policy performance.

And “Carbon” should be clarified to refer to “CO₂ equivalent.” Other greenhouse gases such as methane are significantly more potent than carbon from a climate forcing perspective over shorter time periods, and the prevailing science has illustrated that a comprehensive approach to greenhouse gas reductions is necessary to mitigate climate change. Thus, we recommend

² Executive Order 24.

³ *Shaping the Future: 2014 DRAFT New York State Energy Plan*, Vol. 1. January 2014. At 28.

that the Final Plan incorporate that change in order to ensure adequate attention is paid to mitigating those high impact greenhouse gases in addition to carbon dioxide.

II. Extending and expanding programs for clean renewable energy and energy efficiency will play a central role in meeting these ambitious but achievable GHG goals.

Energy Efficiency: The Draft Plan includes “a state commitment through 2020”⁴ to energy efficiency programs, which are currently set to expire in 2015. While this time horizon is essential to ensuring certainty for utilities, building owners, and contractors to invest in EE, this commitment must be coupled with targets and dollar budgets to capture all cost-effective EE. Based on historical performance and various analyses, a goal of meeting roughly 20% of forecasted demand in 2025 through energy efficiency (which equates to roughly 2% of annual electric demand being met by efficiency over a 10 year period) should be included in the Final Plan, along with comparable programs targeting end use natural gas efficiency. Programs should also be designed to target sectors such as Affordable Multi-Family Housing that have traditionally been underserved and represent a vast reservoir of cost-effective efficiency—a sector in which the value proposition for energy savings is heightened, as low-income families can spend up to 20% of their income on energy, compared with only 4% for the average household.

⁴ *Ibid.* At 31.

Building Codes: Building codes and state appliance efficiency standards must be updated more regularly as well as aggressively enforced. For too long, this area has suffered from lack of funding and political will to follow through on stated commitments. As buildings account for the lion's share of energy demand in the state—72% of primary energy use in 2012⁵—strengthening codes and standards will spur economic growth by reducing overall energy expenditures, create jobs, and reduce emissions. The Final Plan must build on the Draft's mention of codes and standards as a priority by including more specific action items and metrics to ensure the state follows through on that commitment. Specifically, the Codes council process for adopting 2012 IECC/ ASHRAE 90.1-2010 for both residential and commercial buildings has slipped repeatedly and should be a top priority for the administration to complete. We also urge full participation by the State in the IECC model code setting process, including attendance at key IECC meetings. Finally, the State should also be active in promoting stronger energy efficiency standards at the federal level, as these will result in substantial additional energy savings.

Renewable Energy: The Final Plan must scale up renewable energy. As with energy efficiency, the Draft Plan includes “a State commitment through 2025”⁶ to a renewable energy portfolio. While this is positive, the Final Plan should direct the PSC to issue an Order by year-end 2014 that targets meeting half of the state's electricity demand with renewable energy by 2025 (50% by 2025). Further, many customers who pay into the RPS are unable to site solar, wind, or other renewable technologies where they live or work due to infrastructure constraints. To address this barrier, the Final Plan should include a directive to pursue the regulatory and/or legislative

⁵ *Shaping the Future: 2014 DRAFT New York State Energy Plan*, Vol. 2 End-Use Energy. January 2014. At 41.

⁶ *Shaping the Future: 2014 DRAFT New York State Energy Plan*, Vol. 1. January 2014. At 37.

changes necessary to allow customers to aggregate their demand and subscribe to an offsite renewable project that would offset a portion of their demand from the grid (known as “shared renewables” or “community energy”).

III. Fracking

NRDC is pleased that the State Energy Plan appears not to contemplate new high-volume hydraulic fracturing, aka “fracking,” within New York State. NRDC remains opposed to any new fracking in New York until the potential risks to human health and the environment have been fully evaluated. Given that important new science continues to be advanced—particularly with respect to potential health impacts—we support an on-going de facto moratorium on fracking in the state.

In the meantime, we are aware that the state’s continued (and projected increased) consumption of natural gas from other locations results in serious impacts in those places. Although NRDC and others continue to work to ensure that the most protective safeguards are put in place wherever fracking occurs, our top priority must be to move beyond fossil fuels as rapidly as possible. Consistent with the other recommendations made in this testimony, NRDC therefore urges the state to take aggressive measures to reduce our dependence on all fossil fuels, including natural gas, and to ramp up the use of energy efficiency and renewable energy as quickly as possible.

IV. New York should pursue aggressive transportation sector GHG reductions.

In 2012 the transportation sector accounted for 28% of New York’s of primary energy use, and has persistently been the fastest growing sector year over year. New York should build on its

Charge NY initiative to continue investing in electric vehicle (EV) infrastructure, make the necessary regulatory changes at the PSC to remove barriers to EV adoption and create incentives and education programs to accelerate EV adoption.

The Governor must also ensure New York plays a lead role in fulfilling the recently signed 8 state Zero Emission Vehicle MOU, and explore mechanisms that can track the carbon intensity of the state's liquid fuels—which are on a path to get dirtier as tar sands-derived fuels potentially enter the state's market.

There should also be additional goals and implementation details about the proposed initiatives on increasing transportation system and location efficiency and coordinated infrastructure investment through integrated energy, transportation, land use, and sustainability planning, all of which will yield reduced emissions, reduced transportation costs, greater economic growth and a higher quality of life for New York's residents.

Thank you.

Jackson Morris
NRDC
jmorris@nrdc.org