

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

June 8, 2020

Re: Public Service Commission Case Number: 19-G-0678
Proceeding on Motion of the Commission to Investigate Denials of Service Requests by National Grid USA, The Brooklyn Union Gas Company d/b/a National Grid NY and KeySpan Gas East Corporation d/b/a National Grid.

Dear Governor Cuomo:

We write to thank your administration for rejecting the permit for the Williams Northeast Supply Enhancement (NESE) Project and to call on your administration to similarly reject National Grid's other proposals to bring more gas into New York City and Long Island. We urge your Department of Public Service to choose National Grid's "no-infrastructure" options for meeting new demand for heating, hot water, and cooking in downstate New York.

Last year, you rightfully stood up to National Grid when the company refused service to new gas customers in an attempt to bully New York into accepting the Williams NESE Project. We thank you for requiring National Grid to explore other options for meeting the long term needs of its customers and potential customers and for providing opportunities for the public to help choose among these options. We note that the agreement signed between your administration and National Grid requires the state to approve one of these options in June of this year.

National Grid has identified numerous options to bring more gas into its territory. These options are all inconsistent with the Climate Leadership and Community Protection Act (CLCPA), New York's landmark climate law! As the New York Department of Environmental Conservation (DEC) said when rejecting the Williams Pipeline, more gas "is inconsistent with the energy and climate policies, laws and goals of the State."

Instead, the State must approve the set of "no-infrastructure" solutions identified by National Grid, that would manage demand on its gas system with energy efficiency, demand response and heat pumps. This is the only option presented by National Grid that complies with state climate law. This option is more cost effective than the Williams NESE Project and would create over \$3.5 billion in local investments through energy efficiency and heat pumps.

Again, as the DEC said when rejecting the Williams NESE Pipeline permit:

... in order to achieve the State's critical and ambitious climate change and clean energy policies, the State needs to continue its ongoing transition away from natural gas and other fossil fuels. While the Department recognizes that many building assets in the State currently rely on natural gas for heating and other energy uses, the continued long-term use of fossil fuels is inconsistent with the State's laws and objectives and with the actions necessary to prevent the most severe impacts from climate change. Therefore, the State must continue to support the ongoing transition to renewable and other clean sources of energy, as it works to ultimately eliminate all fossil fuel combustion sources that cannot be counterbalanced by guaranteed permanent carbon sequestration. Without appropriate alternatives or GHG mitigation measures, the Project could extend the amount of time that natural gas may be relied upon to produce energy, which could in turn delay, frustrate, or increase the cost of the necessary transition away from natural gas and other fossil fuels.¹

National Grid's preferred alternative to the Williams NESE Project is the Iroquois Enhancement by Compression (ExC) Project and the expansion of their Greenpoint Liquefied Natural Gas (LNG) facility in Brooklyn. These false "solutions" would serve the same purpose as the Williams Pipeline: to bring more methane gas into New York, frustrating the much needed transition away from fossil fuels. Heating, hot water, and cooking services contribute to almost a third of New York's greenhouse gas emissions and account for more than 60% of the gas used in the state. We must electrify these services statewide using efficient technologies like heat pumps and induction stoves in order to plug into New York's growing renewable energy resources and eliminate this large source of greenhouse gasses.

Your administration has already started moving in this direction with the state fracking ban; the Westchester Clean Energy Action Plan, enacted in response to Consolidated Edison's 2019 gas moratorium; and the inclusion of heat pump targets and funding as part of New York's ambitious energy efficiency order, approved in January of this year. Requiring National Grid to pursue non-infrastructure options in lieu of more gas infrastructure is the next important and logical step in this process; allowing them to expand the Iroquois Pipeline and the LNG facility will derail progress.

The gas infrastructure options also pose a risk to public health and environmental justice communities, another violation of the CLCPA, which requires that projects not harm disadvantaged communities.

The gas options preferred by National Grid create real environmental harms. The expansion of compressor stations along the Iroquois pipeline would release toxins into the air, increase greenhouse gas emissions, and increase the risk of explosions and gas breaches, especially considering other nearby gas infrastructure. Further, the use of methane gas inside the home is being increasingly exposed as a health hazard, especially when it comes to gas cooking. The Rocky Mountain Institute, Physicians for

¹ NY Department of Environmental Conservation "Notice of Denial of Water Quality Certification Transcontinental Gas Pipe Line Company, LLC Northeast Supply Enhancement Project DEC ID: 2-9902-00109/00006 – Water Quality Certification" May 15, 2020. https://www.dec.ny.gov/docs/permits_ej_operations_pdf/neseqc denial05152020.pdf

Social Responsibility, Mothers Out Front, and Sierra Club recently published a paper on the dangerous levels of indoor air pollution caused by gas stoves. They found that cooking with gas can cause indoor air pollution so high that it exceeds the legal standards for outdoor air quality, and this can be a major contributor to childhood asthma.²

We call on your administration to both reject the fossil fuels that cause these harms and, at all times, fully enforce the equity and justice provisions of the CLCPA.

Finally, we call your attention to the massive public rejection of gas infrastructure, expressed in nearly 50,000 comments against the Williams NESE pipeline submitted to the DEC and nearly 8,000 comments submitted to the Public Service Commission against all of the gas options considered in National Grid's capacity report. To hear some of these New Yorkers firsthand, we encourage you to [watch a video](#) of the People's Hearing held last week, during which residents from all over the state testified against more fracked gas infrastructure and in favor of energy efficiency and renewable heating.

Thank you for your attention to this important matter.

Sincerely,

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² Brady Seals and Andee Krasner, Health Effects from Gas Stove Pollution, Rocky Mountain Institute, Physicians for Social Responsibility, Mothers Out Front, and Sierra Club, 2020
<https://rmi.org/insight/gasstoves-pollution-health>.

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Big Reuse

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Binghamton Regional Sustainability Coalition

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Broome Tioga Green Party

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Campaign for Renewable Energy

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Chemung County Mothers Out Front

Heather M. Stanton, Team Leader

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Church Women United in New York State

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Citizen Action of New York

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Citizens for Local Power

Jessica Clegg, Coordinator
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Citizens For Water

Joe Levine, Director
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Climate Change Awareness and Action

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CNY Solidarity Coalition

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CNY Solidarity Coalition Climate Justice Committee

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Coalition Against the Rockaway Pipeline

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Concerned Residents of Oxford

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Rockaway Women for Progress

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