

July 16, 2020

VIA E-MAIL

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

**RE: Proceeding on Motion of the Commission in Regard to Gas Planning
Procedures Case Number: 20-G-0131**

Dear Secretary Phillips:

Please accept for filing a comment from 130 organizations supporting the NY Public Service Commission's March 19 launch of a proceeding to align New York's methane gas system planning with New York's legally mandated climate goals and urging the Commission to work with utilities, community organizations, engineers, scientists, and the heat pump industry to develop a comprehensive plan to make an orderly, equitable, and rapid decapitalization of the utility gas system.

Sincerely,

Jessica Azulay
Executive Director, Alliance for a Green Economy
Submitting on behalf of Renewable Heat Now

Proceeding on Motion of the Commission in
Regard to Gas Planning Procedures
Case Number: 20-G-0131

Comment by 130 Organizations in Advance of Staff White Paper

July 16, 2020

The undersigned organizations support the process by the NY Public Service Commission to align New York's methane gas system planning with New York's legally mandated climate goals via an official proceeding launched on March 19th. A growing body of evidence demonstrates the outsized atmospheric warming impact of methane gas when upstream emissions and leaks are accounted for. The continued build out of gas infrastructure by the utilities is irresponsible from both a climate and fiscal perspective and if unabated will prevent New York State from meeting its greenhouse gas reduction targets outlined in the Climate Leadership and Community Protection Act (CLCPA).

The science is clear. Methane gas is a highly potent global warming agent, and approximately 62% of the gas used in New York is delivered directly to customers by gas utilities for heating, hot water, cooking. We must reduce our reliance on fossil fuels for these needs. Heat pump technology is available to make the switch to renewable heat, and hot water and induction is an efficient alternative for cooking. However, most households and businesses are unaware of these options and cannot yet take advantage of them due to cost and policy obstacles.

New York continues to allow utilities to socialize the costs of methane gas infrastructure across all customers, making most new gas hookups free for individual customers. Meanwhile, individual households that want to switch to renewable heat must bear the upfront costs of heat pump infrastructure largely on their own. An effective transition will need resources and planning at a utility scale, which can only be made possible by repurposing the billions of dollars invested by utility customers into the gas system and moving that money into renewable

heating infrastructure and environmentally beneficial electrification instead. An important first step is to require a transparent, standardized reporting of new pipeline costs involved in connecting new customers to gas by all utility companies and an honest accounting of pipeline depreciation.

We urge the Commission to work with utilities, community organizations, engineers, scientists, and the heat pump industry to develop a comprehensive plan to make an orderly, equitable, and rapid decapitalization of the utility gas system. Particular attention must be paid to affordability and accessibility for low income New Yorkers. The utilities should be explicitly disallowed from investing customer money into gas infrastructure, other than for immediate safety repairs. Instead, the utilities should be required to begin decommissioning gas distribution pipelines, prioritizing the leakiest pipes and areas with impending gas shortages first. Renewable, efficient heating, cooking, and hot water technologies must become the default options going forward. Current incentives, while helpful in encouraging early adopters, are inadequate to meet the scale of the needed transition. Only with clear direction from the Public Service Commission can we make the urgently needed transition from fossil fuels to renewable energy.

Thank you for your attention to this important matter.

Sincerely,

350Brooklyn
Sara Gronim, Co-Leader

350NYC
Dorian Fulvio

Acadia Center
Matt Rusteika, Building Initiative Director & Senior Policy Analyst

All Our Energy
George Povall, Executive Director

Alliance for a Green Economy
Andra Leimanis, Communications & Outreach Director

Bethlehem Tomorrow
Jeremy Snyder, Co-Leader

Big Reuse
Justin Green, Executive Director

Binghamton Regional Sustainability Coalition
Adam Flint, Director of Clean Energy Programs

Bronx Climate Justice North
Jennifer Scarlott, Coordinator

Brooklyn Lutherie Inc.
Chloe Swantner, Vice President

Broome Tioga Green Party
Rick Sprout, Chair

Campaign for Renewable Energy
Sara Hess, Convener

Church Women United in New York State,
Mary Smith, Communications Coordinator

Citizen Action of New York
Bob Cohen, Policy Director

Citizens for Local Power
Jess Clegg, Coordinator

Citizens' Climate Lobby – Rochester
Katie Rygg, Co-Lead

Citizens' Environmental Coalition
Barbara Warren, RN, MS, Executive Director

Climate Change Awareness and Action
Peter Wirth, Organizer

CNY Poor People's Campaign
Rev. Beth DuBois, Tri-Chair

CNY Solidarity Coalition Climate Justice Committee
Katherine Burns, Chairperson

Coalition Against The Rockaway Pipeline
Judith K. Canepa, Coordinator

Colorbrightongreen.org
Cheryl Frank, President

ColorPenfieldGreen
Katie Rygg, Editor

Community Advocates for a Sustainable Environment (CASE)
Becky Meier, Co-Founder

Concerned Citizens of Lansing
Diane Beckwith, President

Concerned Health Professionals of New York
Carmi Orenstein, Co-Founder

COPE-Coalition for Outreach, Policy, and Education
Joseph Wilson, Co-Coordinator

Current Hydro LLC
Joel Herm, CEO

Diverso Energy
Jon Mesquita, President

Dryden Resource Awareness Coalition (DRAC)
Charles Geisler, Member

Earthjustice
Meagan Burton, Senior Associate Attorney

EarthKind Energy Consulting
Ron Kamen, CEO

EcoKingston
McKinley Mulstay, Executive Director

Elmirans and Friends Against Fracking
Doug Couchon, Co-Founder

Environmental Justice Taskforce of the WNY Peace Center
Charley Bowman, Chair

First Unitarian Church of Rochester, NY
John Keevert, Co-Chair Social Justice Executive Ministry

Food & Water Action
Alex Beauchamp, Northeast Region Director

Fossil Free Tompkins
Irene Weiser, Coordinator

Frack Action
Julia Walsh, Campaign Director

FrackBustersNY
Mary Finneran, Co-Founder

Gas Free Seneca
Yvonne Taylor, Vice President

Grassroots Environmental Education
Patti Wood, Executive Director

Green Education and Legal Fund
Mark Dunlea, Chair

Green Pathway Consultants
Judith A Karpova, Owner

Greening USA
Melleny T. Hale, Advocacy Chair

HabitatMap
Michael Heimbinder, Executive Director

Halco
Hal Smith, CEO

HeatSmart CNY
Lindsay Speer, Campaign Manager

HeatSmart Orange
Carolyn Cassata, Campaign Manager

HeatSmart Tompkins
Brian Eden, Chair, Board of Directors

Hudson River Sloop Clearwater, Inc.
Manna Jo Greene, Environmental Director

Indian Point Safe Energy Coalition
Marilyn Elie, Organizer

Lake Country Geothermal
Steve Cooper, President

Long Island Progressive Coalition
Lisa Tyson, Director

Mothers Out Front Chemung County
Heather M. Stanton, Volunteer Team Leader

Mothers Out Front Croton on Hudson
Megan Dyer, Leader

Mothers Out Front Dutchess County
Caroline Fenner, Communications and Outreach

Mothers Out Front Long Island
Jennifer Rogers-Brown, Team Coordinator

Mothers Out Front NYS Leadership Team
Billii Roberti, Leadership Team Member

Mothers Out Front Rochester, NY Team
Linda Carol Kubick, Rochester, NY Rep. Mothers Out Front NYS Leadership Team

Mothers Out Front Westchester Rivertowns
Sarah Smiley, Team Co-Coordinator

Nassau Hiking & Outdoor Club
Guy Jacob, Conservation Chair

New Paltz Climate Action Coalition
Jess Mullen, Chairperson

New Paltz Climate Smart Task Force
Janelle Peotter, Climate Smart Coordinator

New York Climate Action Group
Judith K. Canepa, Co-Founder

New York Communities for Change
Jonathan Westin, Director

New York Energy Democracy Alliance
Patrick Robbins, Coordinator

New York Progressive Action Network - Enviro Committee
Cari Gardner, Chair

New York Youth Climate Leaders
Hridesh Singh, Executive Director

New Yorkers for Clean Power
Michaela Ciovacco, Program Coordinator

News from the Neighborhood
Paul Tick, Editor

North American Climate, Conservation and Environment (NACCE)
Jerry Rivers

North Bronx Racial Justice
Jennifer Scarlott, Coordinator

North Brooklyn Neighbors
Anthony Buissereth, Executive Director

Nuclear Information and Resource Service
Timothy Judson, Executive Director

NY Climate Advocacy Project
Ruth Foster, Director

NY Geothermal Energy Organization (NY-GEO)
Bill Nowak, Executive Director

NYC - Grassroots Alliance
Jill McManus, Event Coordinator

NYPIRG
Elizabeth Moran, Environmental Policy Director

Orange Residents Against Pilgrim Pipelines
Sandra Kissam, Chairperson

Partnership for the Public Good
Sam Magavern, Senior Policy Fellow

PAUSE - People of Albany United for Safe Energy
Diana Wright, Letter Signing Committee

Peace Action New York State
Jim Anderson, President

People for a Healthy Environment
Doug Couchon, Co-Founder

People's Climate Movement - Capital Region
Tina Lieberman, Chair

Plymouth Friends for Clean Water
Peter Hudiburg, Founder

PSC AFT
Rachel Youens, Adjunct Professor

PUSH Buffalo
Clarke Gocker, Director of Policy and Strategy

Ratepayer and Community Intervenors
Carol Chock, President

Residents Allied for the Future of Tioga (RAFT)
Gerri Wiley, Co-Founder, Facilitator

Resist Spectra
Courtney Williams, Coordinator

Riverdale Jewish Earth Alliance
Elliott Rabin, Organizer

Riverkeeper
Paul Gallay, President

Rochester Area Interfaith Climate Action (RAICA)
Jim Tappan, Co-Founder

Rochester Area Interfaith Climate Action group Youth (RAICA Youth)
Anna Purtell, Mentor & Remy Commisso, Volunteer

Rochester People's Climate Coalition
Kristen Van Hooreweghe, Collective Impact Project Manager

Rockaway Beach Civic Association
Jeremy Jones, Co-Vice President

Safe Energy Rights Group (SEnRG)
Nancy Vann, President

Sane Energy Project
Kim A. Fraczek, Director

Sanford-Oquaga Area Concerned Citizens (S-OACC)
Gail Musante, Official Signer

Seneca Lake Guardian
Joseph Campbell, President

Sheridan Hollow Alliance for Renewable Energy
Merton Simpson, Co-Chair

Sierra Club Atlantic Chapter
Roger Downs, Conservation Director

Sierra Club Niagara Group
Diana Strablow, Vice-Chair

Sisters of Charity Federation
Teresa Kotturan, Main NGO Representative

Sisters of Mercy
Janet Korn, RSM, Member

Sisters of St. Dominic of Blauvelt, New York
Sr. Joan Agro, OP, Congregational Secretary

Solarize Albany
William Reinhardt, Director

South Asian Fund For Education Scholarship and Training (SAFEST)
Mazeda Uddin, CEO/ President

Stone Quarry House
Nancy Norton, President

Stop NY Fracked Gas Pipeline
Robert Connors, Co-Founder

Stop the Algonquin Pipeline Expansion (SAPE)
Suzannah Glidden, Co-Founder

StopCricketValley.org
Bill Kish, Organizer

Strawtown Studio
Ali Friel, Outdoor Educator

Sullivan Alliance for Sustainable Development
Linda Reik, Board of Directors, Member

Sunrise Ithaca
Marisa Lansing, Hub Coordinator

Surfrider Foundation, NYC Chapter
Noelle Picone, Campaign Lead

Sustainable Tompkins, Inc.
Gay Nicholson, President

Sustainable Warwick
Michael Helme, Steering Committee Member

Syracuse Cultural Workers
Andy Mager, Sales Manager and Social Movements Liaison

Syracuse Peace Council
Carol Baum, Organizer

Tarrytown Environmental Advisory Council
Dean Gallea, Co-Chair

The Climate Reality Project: Capital Region, NY Chapter
Laura Faulk, Chapter Chair

The GreyEdge Group, LLC
Jerry Acton, Complex System Architect, Member

Tompkins County Climate Protection Initiative
Peter Bardaglio, Coordinator

Tompkins County Progressives
Emily Adams, Co-Chair

United for Action
Ling Tsou, Co-Founder

UU Congregation of Binghamton, Green Sanctuary
Wes Ernsberger, Chair

Weather Medic Inc
Jack W. Kanack, President

WESPAC
Nada Khader, Executive Director