



March 3, 2020

Commissioner Basil Seggos
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-1010

President and Chief Executive Officer Alicia Barton
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Re: Need for Clear and Accessible Public Reporting on Climate Progress

Dear DEC Commissioner Basil Seggos and NYSERDA President Alicia Barton:

NYPIRG applauds New York for setting some of the most ambitious goals in the country for tackling the looming climate catastrophe through the 2019 Climate Leadership and Community Protection Act. *In order to ensure New York State meets these ambitious goals, it will be critical to issue annual progress “report cards” to engage the public and assess whether the state is hitting the metrics set in the law.* This crucial accountability measure should be the first order of business for the Climate Action Council.

The legislation established an ambitious plan that mandates that by the year 2040, 100 percent of the state’s electricity be generated non-fossil fuel power; and, that 70 percent of electricity be generated by renewable sources by 2030. In addition, the new law requires that by 2050, the state must reduce greenhouse gas emissions by 85 percent from 1990 levels and offset the remaining 15% by reforestation, carbon sequestration in soils and other actions.

The first action the council must take is to develop a baseline of where the state currently stands in terms of renewable power and greenhouse gas emissions. **It is critically important that the council set that benchmark and develop an easy-to-use, publicly accessible climate goal dashboard to ensure accountability of the progress the state is making.**

Currently, this information is very difficult to access. Information related to where New York stands on greenhouse gas emissions, renewable energy, energy efficiency, and other goals are not available on a single, consolidated website. If the public doesn’t know where the state stands now, there will be no way to determine whether we’re making progress in meeting these ambitious -- but absolutely necessary -- goals.

There is a history of the state’s environmental rhetoric not meeting the environmental reality.

New York only gets approximately 5% of its electricity from wind and solar, and including hydropower, the contribution from renewable energy resources to meet the State’s electric load

was 26.8% as of 2017. By comparison, an order of the Public Service Commission (PSC) in 2010 set a goal of 30% by 2015, which New York has yet to meet. The most recent State Energy Plan (2015) establishes a goal of 50% renewable energy by 2030.

In order to meet the new legislation's goals, New York must cut greenhouse gas emissions by 2.7% each year to meet its 2030 goal, and 2.25% each year afterwards to meet the 2050 goal. Emission reductions must be accelerated across all sectors, especially in transportation, which accounts for the largest share of greenhouse gas emissions in New York.

If New York is going to meet its renewable energy goals, solar and wind will need to increase by 6.5% annually until 2030, and 3% annually afterwards to meet the 2040 goal.

But unless there is widespread public support for these changes, the overhaul of the state's energy sector will be much harder to achieve. And the key to that success hinges on the Climate Action Council taking its first steps – immediate steps – to ensure accountability and transparency in tracking progress toward its important goals.

Failure to achieve those goals could result in a more devastating future for the people of the world. Among its first tasks, the Council should develop a dashboard so New Yorkers can monitor whether New York is meeting its mandate to reduce greenhouse gas emissions and transition to renewable energy. **Attached to this letter, you will find a scorecard NYPIRG has drafted that could be used as a model.**

Thank you for your consideration of our comments, and we look forward to working with you to help New York lead the nation in fighting the climate crisis.

Sincerely,

Elizabeth Moran
Environmental Policy Director
NYPIRG

CC: Members of the Climate Action Council
Honorable Steve Englebright, Chair, Environmental Conservation Committee
Honorable Todd Kaminsky, Chair, Environmental Conservation Committee
Honorable Kevin Parker, Chair, Energy Committee
Honorable Michael Cusick, Chair, Energy Committee

NEW YORK STATE CLIMATE CHANGE SCORECARD

Reduction of Greenhouse Gas Emissions

Currently: New York has reduced greenhouse gas emissions by 13% since 1990.¹ Electricity emissions have declined 51% since 2005.²

Goals: The Climate Leadership and Community Protection Act (CLCPA) has established a goal to reduce greenhouse gas emissions by 85% below 1990 levels, and net-zero emissions, by 2050. There is an intermediary goal of 40% by 2030.

Areas for Improvement: New York must cut emissions by 2.7% each year to meet its 2030 goal, and 2.25% afterwards to meet the 2050 goal. Emission reductions must be accelerated across all sectors, especially in transportation, which accounts for the largest share of greenhouse gas emissions in New York.³

Renewable Energy for Electricity

Currently: New York only gets approximately 5%⁴ of its electricity from wind and solar. Including hydropower, the contribution from renewable energy resources to meet the State's electric load was 26.8% as of 2017.⁵ The most recent State Energy Plan (2015) establishes a goal of 50% renewable energy by 2030.⁶

Goals: The CLCPA establishes goals to achieve 70% renewable energy by 2030 and 100% carbon-free by 2040. There are also specific goals of achieving 6GW of distributed solar by 2025 and 9GW of offshore wind by 2035.

Areas for Improvement: If New York is going to meet its renewable energy goals, solar and wind will need to increase by 6.5% annually until 2030, and 3% annually afterwards to meet the 2040 goal.

Energy Efficiency

Currently: New York consumed 3,670.2 trillion Btu of energy, as of 2016.⁷ ACEEE ranked NYS 5th in energy efficiency in 2019.⁸

Goals: In 2018, the Governor set an efficiency target for reduction of energy use in buildings of 185 trillion British thermal units (tBtu) from 2025 projections, with a sub-target of 3% annual electric efficiency savings by 2025.⁹ This target was codified in the CLCPA.

Areas for Improvement: The state moved up in ranking from 6th to 5th in the ACEEE annual scorecard – now the momentum has to be kept up. The state should revise building codes to set stronger energy efficiency and renewable energy targets and to move towards them more rapidly.

¹ NYSERDA, "New York State Greenhouse Gas Inventory: 1990-2016," July 2019,

<https://www.nyserdera.ny.gov/About/Publications/EA-Reports-and-Studies/Greenhouse-Gas-Inventory>

² NYSERDA, "New York State Greenhouse Gas Inventory: 1990-2016," July 2019, p. S-10,

<https://www.nyserdera.ny.gov/About/Publications/EA-Reports-and-Studies/Greenhouse-Gas-Inventory>

³ NYSERDA, "New York State Greenhouse Gas Inventory: 1990-2016," July 2019, p. S-12,

<https://www.nyserdera.ny.gov/About/Publications/EA-Reports-and-Studies/Greenhouse-Gas-Inventory>

⁴ Solar Energy Industries Association, "Solar State by State," 2019, <https://www.seia.org/states-map> and American Wind Energy Association, "Wind Facts at a Glance," 2019, <https://www.awea.org/wind-101/basics-of-wind-energy/wind-facts-at-a-glance>

⁵ NYSERDA, "Clean Energy Standard Annual Progress Report: 2018 Compliance Year," December 2019, p. ES-1

⁶ NYSERDA, "2015 State Energy Plan Overview," <https://energyplan.ny.gov/Plans/2015.aspx>

⁷ "2016 New York State Energy Fast Facts," NYSERDA, January 2019,

<https://www.nyserdera.ny.gov/About/Publications/EA-Reports-and-Studies/Patterns-and-Trends>

⁸ ACEEE, "State and Local Policy Database," <https://database.aceee.org/state-scorecard-rank>

⁹ Governor Cuomo, "Governor Cuomo Announces Dramatic Increase in Energy Efficiency and Energy Storage Targets to Combat Climate Change," December 13, 2018, <https://www.governor.ny.gov/news/governor-cuomo-announces-dramatic-increase-energy-efficiency-and-energy-storage-targets-combat>

Solar – Rooftop and Community Solar (i.e. Distributed) and Grid-Scale Solar

Currently: New York currently has 1.8 gigawatts (GW) of distributed solar.¹⁰

Goals: The CLCPA establishes a goal to achieve 6 GW of distributed solar by 2025.

Areas for Improvement: To meet the goal of 6 GW by 2025, rooftop and community solar will need to increase by 0.8 GW annually. To meet the 70% by 2030 goal, grid scale solar construction needs to commence and generation needs to increase by roughly 0.5 GW annually.

Offshore Wind and Land Based Wind

Currently: New York currently has 2 GW of land based wind energy.¹¹ There is no operating offshore wind serving New York.

Goals: The CLCPA establishes a goal of 9 GW of offshore wind energy by 2035. And, to meet the 70% by 2030 goal, NYS will likely have to more than double the land-based wind.

Areas for Improvements: Land based wind needs to increase by 200-400 MW per year to meet the 2030 goal. The first offshore wind project will come online in 2022 or 2023; offshore wind energy will need to increase by an average of 750 MW annually to meet the 2035 goal.

Energy Storage

Currently: New York currently has 62.2 megawatts (MW) of energy storage capacity.¹²

Goals: The CLCPA establishes a goal to achieve 3 GW of storage capacity by 2030. Additionally, New York has a goal to achieve 1.5 GW by 2025.¹³

Areas for Improvement: New York currently has a roadmap to achieve its 1.5 GW energy storage goal by 2025.¹⁴ To achieve the 2030 goal, energy storage capacity must increase by 0.3 GW annually.

¹⁰ Solar Energy Industries Association, "Solar State by State," 2019, <https://www.seia.org/states-map>

¹¹ American Wind Energy Association, "Wind Facts at a Glance," 2019, <https://www.awea.org/wind-101/basics-of-wind-energy/wind-facts-at-a-glance>

¹² "Distributed Energy Resources: Data Visualization," NYSERDA, <https://der.nyserda.ny.gov/data/>

¹³ "Energy Storage," NYSERDA, <https://www.nyserda.ny.gov/All-Programs/Programs/Energy-Storage>

¹⁴ "Energy Storage Roadmap," PSC and NYSERDA, June 21, 2018, <https://www.nyserda.ny.gov/All-Programs/Programs/Energy-Storage>