



August 21, 2015

The Honorable Kathleen H. Burgess
Secretary
NYS Public Service Commission
Three Empire Plaza
Albany, New York 12223-1350

Re: Case #14-M-0101, Benefit-Cost Analysis White Paper in the REV Proceeding

Dear Secretary Burgess,

Please accept the following comments from Sustainable Otsego on the Benefit-Cost Analysis (BCA) White Paper that has been issued as part of the REV proceeding.

We are extremely concerned that the BCA white paper overlooks critical climate change, pollution, and landscape level environmental impacts of fossil fuels, particularly natural gas, and in so doing creates a biased argument for the expansion of natural gas use, gas-fired power plants, and related infrastructure than contravenes renewable energy goals of the 2015 New York State Energy Plan.

Specifically, the white paper addresses just three emission compounds in its analysis: carbon dioxide (CO₂), Sulfur Dioxide (SO₂), and Nitrogen Oxides (NO_x). However it ignores several other pollutants or greenhouse gases such as methane, particulate matter, volatile organic compounds (VOCs), and formaldehyde.

The fact that the BCA discusses the climate impact of carbon dioxide, but completely ignores methane is alarming. The Inter-Governmental Panel on Climate Change (IPCC) has determined that methane—the main ingredient of natural gas—is 34 times more potent than carbon dioxide a driver of climate change over 100 years, and 86 times more potent over twenty. Climate scientists warn that dramatic action must occur within the next two decades to prevent the worst impacts of climate change, o this 20-year timeframe is most important. Furthermore actual leakage rates of methane are far greater than estimates by the EPA, as demonstrated by a growing body of peer-reviewed research, including the work of Dr. Robert Howarth of Cornell.¹ When total life-cycle emissions including

¹ *A Bridge to Nowhere: Methane Emissions and the Greenhouse Gas Footprint of Natural Gas*, Robert W. Howarth, *Energy Science & Engineering*, April 2014. <http://onlinelibrary.wiley.com/doi/10.1002/ese3.35/pdf>

production, processing, storage, transmission, and distribution are taken into account, natural gas is no better for the climate than coal.

Likewise, by ignoring particulate matter and VOCs, the BCA dismisses carcinogenic pollutants associated with gas infrastructure such as compressor stations. VOCs and NOx also combine to produce ground-level ozone which is responsible for health problems around such facilities. Furthermore, formaldehyde—a known carcinogen—is a product of incomplete natural gas combustion and is also produced when fugitive methane emissions interact with sunlight.

The BCA ignores the cumulative negative ecological and societal impacts associated with the proliferation of fossil fuels, namely natural gas produced from fracking. Although high-volume slick-water hydraulic fracturing has been prohibited in New York, increasing our state's dependency on fracked gas directly induces harm where fracking still occurs, an ethical dilemma that the BCA must not ignore. In addition, the expansion of gas infrastructure (including pipelines, power plants, compressor stations, and storage facilities) damages natural resources and fragments ecosystems. The proposed Constitution Pipeline is an egregious example of this, as it would tear through one hundred miles of pristine forests, fields, wetlands, and streams of the southern Tier and northern Catskills.

Many of these impacts to public health, the environment and climate change could be substantially reduced or eliminated by the swift transition to a renewable economy. It is also well documented that the renewable energy sector generates far more jobs as a function of energy produced than fossil fuels.²

Without substantial revision, this Benefit-Cost Analysis will be ineffective in facilitating decisions that serve the public interest. We urge you to develop a far more comprehensive BCA than what has been produced to date. Thank you for considering these comments.

Sincerely,



Keith Schue
for Sustainable Otsego

NOTE:

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² *Examining the Feasibility of Converting New York State's All-Purpose Energy Infrastructure to One Using Wind, Water, and Sunlight*, Mark Z. Jacobson, Robert W. Howarth, Mark A. Delucchi, Stan R. Scobie, Jannette M. Barth, Michael J. Dvorak, Megan Klevze, Hind Katkhuda, Brian Miranda, Navid A. Chowdhury, Rick Jones, Larsen Plano, Anthony R. Ingraffea, February 2013.

<http://www.stanford.edu/group/efmh/jacobson/Articles/I/NewYorkWWSEnPolicy.pdf>