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VIA ELECTRONIC SUBMITTAL

John B. Howard, Interim Chief Executive Officer
Hon. Michelle L. Phillips, Secretary to the Commission
James A. Denn, Public Information Officer
New York Department of Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223

RE: Case Number 21-M-0238

EnergyMark, LLC writes in support of the repurposing of the Fortistar of North Tonawanda property under the New York State Public Service Law Sections 70 and 83.

EnergyMark has supplied natural gas, electricity, and renewable energy for over 15 years to more than 15,000 residential, commercial, and industrial customers throughout Western New York and Northwest Pennsylvania. EnergyMark has also played a key role in the development of renewable energy in the region.

Most recently EnergyMark aided in the development of a 10-megawatt community solar project located at the West Valley Nuclear Project site, on 46 acres, in Cattaraugus County. EnergyMark prides itself on being a leader in renewable energy development and is actively exploring new opportunities to bring sustainably sourced energy to Western New York.

One such opportunity comes in the form of renewable natural gas (RNG). RNG is a pipeline quality gas that is fully interchangeable with conventional natural gas. RNG is commonly sourced from landfills, animal manure, food scraps and waste-water scraps.

Greenhouse gas emissions benefits associated with RNG use primarily stem from:

- The capture and recovery of methane produced at a landfill or anaerobic digestion facility.
    - Municipal solid waste landfills are the third-largest source of human related methane emissions in the US (accounting for approximately 15.1 percent of these emissions)
    - Methane has a global warming potential more than 25 times greater than CO_2 and a relatively short (12-year) atmospheric life, so reducing these emissions can achieve near-term beneficial impacts in mitigating global climate change. (EPA.gov)
- Displacement of conventional fossil fuel use (i.e. natural gas, oil)

In many cases, renewable natural gas avoids more emissions than it generates, leading to a net-negative carbon intensity (in terms of carbon dioxide emissions avoided per quantity of fuel consumed)

Digihost International Inc. has stated they are committed to aligning themselves with the New York Climate Leadership and Community Protection Act by implementing an environmental plan that will allow the Fortistar North Tonawanda plant to be 100% zero emissions by 2025. The first step in this plan is to convert the fuel source for the plant to RNG. EnergyMark will be able to source this RNG from local landfills and animal farms and deliver it through existing pipelines with firm capacity, directly to the North Tonawanda plant. As other renewable energy infrastructure becomes available (i.e. solar, wind, hydropower, and hydrogen) EnergyMark would work hand in hand with Digihost to ensure a conversion to these technologies.

Sourcing RNG as the input fuel for this facility is one piece of the puzzle. The current application for this facility will be in Blockchain transactions, however, in the future this facility could be utilized to support the development of Artificial Intelligence and Machine Learning. We believe that Blockchain technology, and specifically this facility, will help to accelerate the adoption of renewable energy in New York State. Similar to how technology companies invested heavily in renewables over the past decade, we will see similar capital injections into the Blockchain space that will enable further innovation in renewable generation.

In addition to hosting a Blockchain operation on site, this facility will also supply electricity into the local distribution system. This electricity will be generated with the same RNG that is being sourced to fuel the plant. As we transition to renewable and sustainable generation sources, it is important that we do so in a pragmatic and reliable fashion. Natural Gas fired generation offers quick and resilient electricity onto our state's electricity grid. During peak days of the summer and winter, Natural Gas generators produce more than 65% of our state's electricity onto the grid. Given what we saw happen throughout the Midwest, and especially Texas during this recent winter, it is more important than ever to have adequate resources in place to **reliably supply electricity** onto our electrical grid. This facility will be able to do so, while sourcing its input fuel from renewable sources.

Repurposing the Fortistar North Tonawanda plant provides Western New York with a unique opportunity to position itself as a leader in the use of renewable energy for data applications. In a data driven world, utilizing local renewable fuels to power these energy intensive technologies is sustainable and furthers regional goals for clean energy.

Sincerely,

Luke Marchiori
Executive Vice President
EnergyMark, LLC