



GRASSROOTS ENVIRONMENTAL EDUCATION

184 Main Street • Port Washington • New York 11050 • T 516.883.0887 • www.grassrootsInfo.org
P.O. BOX 848 • White Plains • New York 10602 • T 914.422.3141

Via Email

October 11, 2021

John B. Howard, Interim Chief Executive Officer
Hon. Michelle L. Phillips, Secretary to the Commission
James A. Denn, Public Information Officer
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, New York 12223-1350

Re: Fortistar North Tonawanda
North Tonawanda, New York
Case Number: 21-M-0238

Dear Mr. Howard, Ms. Phillips and Mr. Denn,

Thank you for the opportunity to submit comments to the New York State Public Service Commission (PSC) regarding the proposed transfer of ownership of the Fortistar North Tonawanda energy facility to Digihost .

Grassroots Environmental Education is a science based environmental health nonprofit in New York serving local and state governments, school systems, environmental and civic organizations, health professionals and individuals nationwide. Our educational programs, resources and solution tools are based on peer-reviewed science and are developed in consultation with a network of leading medical and scientific experts.

We strongly urge the PSC to reject the transfer of ownership of this power plant to Digihost. Digihost will use this plant for its own gain to power a Proof of Work (PoW) cryptocurrency mining operation, which will use fossil fuels to generate the energy for the purpose of running data computers 24/7 year round for producing cryptocurrencies, an extremely energy intensive process that will vastly increase greenhouse gas emissions and toxic air pollutants.

We're out of time. Mounting and unprecedented extreme weather events including heat waves, poor air quality days, wildfires, droughts, flooding and the most recent dire report by the Intergovernmental Panel on Climate Change (IPCC) should serve as a loud wake up call for the PSC. In recent months alone, millions of New Yorkers have borne the brunt of a growing number of days with hazardous high heat indexes and exceedingly high levels of particulates and ground level ozone pollution considered "UNHEALTHY" for the general population and especially dangerous for vulnerable populations including children, developing fetuses, seniors, individuals with lung and cardiovascular diseases, diabetes, immune compromised systems, low income

communities and communities of color. The recent flash flooding disasters during Hurricane Ida have also taken a devastating toll on New Yorkers and resources.

Over the last several years, the Fortistar plant has operated between 14-20 days annually since 2018 with annual air emissions ranging from 9,245 tons of CO₂ to 12,488 tons of CO₂. As a cryptocurrency mining operation, the estimated CO₂ emissions will be approximately 30 times that amount annually, worsening air quality and exacerbating our climate crisis. This transaction only serves to benefit Digihost and its cryptocurrency mining operations and provides no public benefit. Indeed, its operation would contribute to considerable public harm and would violate the Climate Leadership and Community Protection Act (CLCPA) by dramatically increasing greenhouse gas emissions instead of reducing them as mandated.

Furthermore, Digihost claims that they will use “renewable natural gas,” which will, in fact, perpetuate the release of significant amounts of greenhouse gas emissions and hazardous air pollution while their promises to switch to hydrogen, which is not even currently available, involves a process that requires more energy to produce than it yields.

New York State needs to rapidly scale up critically important renewable energy resources for the purpose of meeting its time sensitive climate goals, not for being further overburdened by the extremely energy intensive needs and consumption by this company and others like it for their own private use and gain.

It is also of serious concern that the plant would need enormous quantities of water on a daily basis, approximately 500,000 gallons per day, which is approximately 12% of North Tonawanda’s total water usage. Significant noise pollution is another adverse impact from these types of operations.

The proposed transfer of ownership of Fortistar to Digihost does not serve the public interest at all. The adverse impacts to air quality, water supplies, public health, our climate and the lack of compliance with New York’s climate law are more than reason enough to reject this ill-advised transaction. Digihost’s cryptocurrency mining operations in North Tonawanda would only provide benefit to the company and its shareholders and derail New York’s climate policy and goals. With so much at stake for millions of New Yorkers statewide bearing the brunt of the sharp increase in extreme weather events and poor air quality the Public Service Commission has only one justifiable action – the rejection of this transaction without further delay.

Respectfully submitted by,

Ellen Weininger
Director of Educational Outreach
ellen@grassrootsinfo.org