

New York Department of Public Service Commission
Empire State Plaza, Agency Building #3
Albany, New York 12223-1350

Re: Docket Number 21-M-0238
Petition of Fortistar North Tonawanda, Inc. and Digihost International Inc.

These comments are submitted on behalf of the Interfaith Climate Justice Community (ICJC), a network of fourteen (14) faith communities in Western New York seeking climate justice. This letter is submitted in opposition to the Petition seeking approval of the sale of the Fortistar gas energy facility to Digihost International, Inc. for the purpose of mining Bitcoin/cryptocurrency.

The proposed Digihost Bitcoin mining facility will expend enormous amounts of electricity to mine a product which is of speculative value and is known to have been used to avoid government regulation, taxes, and to have been used in illegal activities. The use of electricity for such purposes is unconscionable in the face of the worldwide climate change emergency.

The proposed Digihost Bitcoin mining facility creates speculative currency through a Proof of Work model which is extremely energy intensive. The Proof of Work Bitcoin and cryptocurrency market itself is not in the public good. Bitcoin produced by other models such as Proof of Stake or Proof of Authority can produce similar currency without the waste of energy and emission of greenhouse gases and with more opportunity for regulation and public control.

Digihost claimed in an August 26, 2021 letter to the Public Service Commission that it would immediately use renewable natural gas instead of fracked gas to operate its facility. It does not appear however that there is anywhere near a sufficient amount of renewable natural gas to operate the gas plant. This will naturally require the continued use of large amounts of fracked methane gas to operate the system. Methane gas released to the atmosphere is a much more dangerous greenhouse gas than carbon dioxide, retaining 86 times more heat than CO₂ in the first 20 years of its release. The Digihost letter goes on to state that other forms of energy will be used, first solar and hydro and then transforming to Green Hydrogen. The use of solar and hydro

sourced electricity would waste precious renewable energy required for transforming our transportation and heating and cooling systems to electric. The plan for Green Hydrogen is even more flawed, in that it would waste 20-40% of the renewable energy utilized to create Green Hydrogen. Green Hydrogen is not a proper source of fuel.

We are also concerned about the immediate affects to nearby residents from noise and emissions such as leaked methane, carbon dioxide, nitrous oxide and volatile organic compounds (VOCs) from various intended fuels. Digihost, Inc. has also discussed daily use of at least 500,000 gallons of drinking water for cooling at the plants. The superheating of water is also a threat to fish and aquatic life. For the above reasons, we ask that the sale of the Fortistar Gas Plant to Digihost be rejected by the Commission.

ROGER COOK
ICJC Co-Chair
1515 West River Road
Grand Island, New York 14072

SR. EILEEN O'CONNOR
ICJC Co-Chair
77 Garnet
Amherst, New York 14226