

Public Comments on the Draft Scoping Plan Presented on April 26, 2022 by Roger Caiazza

I am going to summarize the written comments I submitted on April 22 to the Council. I don't think the Council, much less the public, appreciates the Draft Scoping Plan's claimed benefits, costs, threats to reliability, or effect of the proposed reductions on global climate change.

The scoping plan claims that "The cost of inaction exceeds the cost of action by more than \$90 billion". That statement is inaccurate and misleading. The plan claims \$235 billion societal benefits for avoided greenhouse gas emissions. I estimate those benefits should only be \$60 billion. The Scoping Plan gets the higher benefit by counting benefits multiple times. If I lost 10 pounds five years ago, I cannot say I lost 50 pounds but that is what the plan says.

The cost estimates are poorly documented but I have determined that they misleadingly exclude the costs in the transportation investments category needed to make the necessary reductions. The semantic justification is that the program is already implemented. Adding \$700 billion for that and using the correct avoided cost of carbon means that costs are at least \$760 billion more than the benefits.

Reliability will be risky. When buildings are 100% electric and transportation rely on electric vehicles, what happens when there is an ice storm? There are many similar "what if" scenarios not considered.

New York emissions are less than one half of one percent of total global emissions. Global emissions have been increasing on average by more than one half of one percent per year.

Anything we do will be displaced in a year, cost a lot of money and risk catastrophic blackouts. The plan must be revised to one based on technically achievable incremental steps that maintain current standards of affordability and reliability.

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[Citizens Guide to the Climate Act](#)