



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
SCOTT M. STRINGER

September 23, 2020

Hon. Michelle L. Phillips  
Secretary  
NYS Board on Electric Generation Siting and the Environment  
Empire State Plaza, Agency Building 3  
Albany, New York 12223

**Re: Comment on the Gowanus Repowering Project (Case 18-F-0758)**

Dear Secretary Phillips,

I am writing to convey my opposition to the Astoria Generating Company's Gowanus Repowering Project proposal, which I believe is directly incompatible with our emissions goals, the wellbeing of our local communities, and our progress towards a more sustainable future. The unchecked development of fossil fuel infrastructure, including both the Gowanus proposal and similar plans for a gas-powered 'peaker' plant in Astoria, is in direct contradiction with the clean energy and environmental justice goals of the Climate Leadership and Community Protection Act (CLCPA). I urge the State to reject the Gowanus proposal, which will spew out localized pollution for years to come and instead work to accelerate a transition to a clean energy future by facilitating the deployment of solar generation, battery storage, demand management, and energy efficiency measures. Rather than reinforcing the fossil fuel status quo, it is now past time to overhaul our energy infrastructure to allow for the expeditious retirement of the eighteen fossil-fuel powered 'peaker plants' currently polluting the City's air and instead replace them with renewable and battery powered solutions that generate both reliable power and good jobs.

The Gowanus Repowering Project proposal would only serve to lock the city into decades of future emissions, all while forcing ratepayers to ultimately pick up the tab for a project that pollutes their own air. Astoria Generating Company's redevelopment plans would replace its existing peaker plant, located on barges floating on Gowanus Bay, with eight natural gas-fired turbines designed to produce 590 megawatts of energy. The plant's exclusive use of natural gas puts it in direct contradiction with the CLCPA, which requires the sourcing of 70 percent of electricity from renewable sources by 2030 and the elimination of all fossil fuel power generation by 2040. Rather than allowing fossil fuel use to continue at the site, the State must seize this opportunity to encourage projects that can help meet benchmarks for the adoption of renewables and energy storage. The retirement of this plant could be used as an opportunity to help satisfy the State's aim of deploying energy storage projects that reduce the use of fossil fuel

peaker plants located in environmental justice communities.

It should be stressed that the CLCPA requires the reduction of emissions emanating both from power plants and upstream emissions associated with the extraction and delivery of natural gas. Given the terrible potency of methane gas and the well-documented environmental harms posed by fracking and pipelines, it seems exceedingly unlikely that the Astoria Generating Company's plans can actually contribute towards the emissions reduction mandates in the CLCPA no matter how much they tout the 'efficiency' of the new plant. These concerns were cited in DEC's rejection of the Williams Pipeline and I urge the Board to mandate that this project likewise be evaluated for the full lifecycle emissions caused by gas use.

The community surrounding the plant is an environmental justice community, composed of working-class people of color. The area has been subject to decades of environmental abuse and neglect. The plant's barges already border the Gowanus canal, a superfund site. The proposal poses real risks to the long-term health of the community. Of particular concern are the air quality impacts associated with the project and the likelihood that localized emissions would perpetuate existing health and environmental disparities in Sunset Park. The ongoing COVID-19 crisis has cruelly taught us that the burdens of disease are not shared equally and that people of color suffer disproportionate impacts from air pollution. Initial studies have shown that even a small increase in exposure to air pollution drastically increases COVID-19 related morbidity. Even absent a global pandemic, exposure to fine air pollution claims the lives of more than 3,000 New Yorkers every year, and air pollution has measurable effects on mental health, childhood development, and worker productivity. When non-polluting alternatives exist, it is incumbent on the Astoria Generating Company to fully explain why it is at all necessary to subject area residents to continued air pollution instead of embracing alternatives. I urge the Siting Board to mandate that the project be rigorously assessed for its impacts on air quality, including evaluating scenarios where the plant may be forced to operate over extended periods with a high number of start-ups and shutdowns.

While I unequivocally oppose the proposal, I do want to stress the need to maintain a reliable energy grid that serves the needs of New York's citizens and economy. Fortunately, New York has the opportunity to embrace proven technology and policies that can help us modernize our grid, increase resiliency, and transition to a low carbon future. Already, government is laying the groundwork. The State is pursuing necessary investments that would eventually bring gigawatts of offshore wind and solar onto our system. New York City's Local Law 97 is expected to reap significant energy efficiency savings that will be reinforced by State programs like New Efficiency: New York. These initiatives should start to bend the curve and help bring electrical loads down. The State and the City must keep pressing forward with demand response and energy efficiency programs that can go further to reduce peak demand and to make the grid more resilient. All of these programs would generate the kind of green, well-paid jobs that can help jumpstart New York's economy. These are achievable goals and should be prioritized over the existing Gowanus plant with another gas powered facility.

Batteries will be essential to sustainably and reliably meeting electrical demand. Battery technology is advancing by the day and already is capable of efficiently delivering large amounts of energy at competitive prices. With the aim of retiring all peaker plants operating in the city, I believe New York must double down on battery technology and onboard as many large-scale and smaller distributed batteries as possible. The approval of a 316 megawatt battery at the Ravenswood Generating Station in Long Island City is an encouraging step. Replacing the

existing plant with batteries would be an opportunity to showcase how the technology could be deployed at other plants across the city.

I urge the Siting Board to do all in its power to stop this project and put New York on track for a greener future.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Stringer". The signature is fluid and cursive, with the first name "Scott" and last name "Stringer" clearly distinguishable.

Scott M. Stringer  
New York City Comptroller