



New York State Association of Plumbing-Heating-Cooling-Contractors₁ Inc.

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MEMORANDUM IN OPPOSITION

S562 A Kavanaugh, BRESLIN, BRISPORT, BROUK, CLEARE, GIANARIS, GONZALEZ, GOUNARDES, HARCKHAM, HINCHEY, HOYLMAN-SIGAL, JACKSON, KRUEGER, LIU, MAY, MAYER, MYRIE, PARKER, RAMOS, RIVERA, SALAZAR, SANDERS, SEPULVEDA, SERRANO

AN ACT to amend the executive law, in relation to enacting the "all-electric building act"

Local PHCC Chapters

**ACP City
of New
York**

**Associated PHCC
of Rochester**

**PHCC of Long
Island**

**Plumbing
Contractors
Association of
Long Island,
Inc.**

**Western New York
Association of
Plumbing &
Mechanical
Contractors, Inc.**

**PHCC of Western
New York**

On behalf of the NYS Association of Plumbing Heating Cooling Contractors, Inc., (NYSPHCC), we are respectfully opposed to S562A Kavanaugh. This bill proposes to decrease greenhouse gas emissions and air pollution in new construction projects statewide no later than December 31, 2023, if the building is less than seven stories and July 1, 2027, if the building is seven stories or more

The New York State Association of Plumbing, Heating, Cooling, Contractors certainly supports preserving the environment, and has been committed to providing consumers with high efficiency products that provide domestic hot water, air conditioning, and heating for indoor spaces in an economical fashion. However, the elimination of the choice of energy sources (gas) for consumers removes affordable options for many of them and benefits specific energy sector providers and associated industries.

Our customers are concerned about keeping energy costs affordable, staying warm and comfortable in the cold New York winter, and overall sustaining a quality of life they wouldn't otherwise enjoy without natural gas.

The cost of having to retrofit homes if natural gas is banned will have a significant impact and be very expensive for our customers throughout the state of NY. The NYSPHCC asks that you and your colleagues in the legislature consider that the abandonment of existing infrastructure for heating with natural gas is walking away from years of capital investments in a reliable energy distribution system that has performed admirably for all communities.

Consumers have needs, and they want heat and hot water in an affordable form. Consumers are also not naïve; they are aware of global conditions and have differing levels of buy-in to the situation. The only reason to affect a ban is to offset the inequities of electrification. There are serious concerns about performance of electrification products, installation costs, operating costs, and reliability.

The legislature should allow the Climate Action Council (CAC) to finalize its recommendations and guidance and not circumvent and cut short an open and transparent process. While the NYSPHCC may not agree with the final recommendations of the CAC, we believe it should be given the opportunity to conclude its work. This legislation inappropriately preempts efforts of the CAC and subverts the deliberate and thoughtful process previously established by the legislature.

For all of the reasons outlined in this memorandum, NYSPHCC respectfully opposes S562A Kavanaugh. IF you have any questions or need additional information, please contact our government affairs representative: Nick Barrella; nbarrella@parkstrategies.com; (518) 426-3800.

Respectfully,

A handwritten signature in cursive script that reads "Dorothy Reddy".

Dorothy Reddy
Executive Director
NYSPHCC