



**Memo of Opposition**  
**S.4158 (Krueger)/A.4870-A (Simon)**  
**NY HEAT Act**

MACNY – The Manufacturers Association, representing more than 330 manufacturers and organizations across Central New York, the Mohawk Valley, and Northern New York, oppose S.4158 (Krueger) /A.4870-A (Simon), the “NY Home Energy Affordable Transition Act” or NY HEAT Act, which would transition residential and commercial heating from natural gas to electricity. The bill would amend Public Service Law to align state utility laws with the climate mandates in the CLCPA. While manufacturers understand the well-intentioned motives behind this legislation and support overall state decarbonization efforts, the legislation’s implementation would reduce energy security and have significant adverse effects on the manufacturing industry, manufacturing workers, and local communities.

The manufacturing sector plays a crucial role in the economic prosperity of New York. Companies rooted in New York provide well-paying jobs and benefits to their employees. This legislation runs counterintuitive to the State’s efforts to revitalize the manufacturing sector by restricting the availability of reasonably priced energy to manufacturers. As a result, the sector would face yet another challenge to remain competitive with other jurisdictions without these type of restrictions.

Certain provisions of this bill, such as removing a utility’s obligation to serve, authorizing the discontinuance of the gas system under conditions, and setting restrictions on new gas infrastructure, arbitrarily creates new restrictions and provides unprecedented authority to the Public Service Commission. Businesses strive for predictability and certainty to plan years in advance where investments will be made. Without a guarantee that natural gas will be available as a resource, it would be difficult to justify new investments across New York. Moreover, the proposed NY-HEAT Act could exacerbate the existing problem of energy insecurity in New York. Therefore, the state risks losing its competitive edge in attracting and retaining manufacturing investments, ultimately compromising long-term economic growth.

To date, manufacturing companies across New York have voluntarily adopted innovative technologies and practices to minimize emissions and enhance energy efficiency. Rather than imposing overly prescriptive mandates, we urge policymakers to consider incentivizing and supporting ongoing efforts through targeted initiatives and investment incentives.

Furthermore, capping residential customer utility bills to 6% of their income would lead to other customers, such as businesses and manufacturers, subsidizing these utility bills. We strongly suggest addressing the cost of utility bills through other means by engaging in collaborative dialogue with the manufacturing industry to develop pragmatic solutions that balance environmental objectives with economic realities. Working together, we can achieve meaningful progress toward a sustainable future, while safeguarding the vitality of New York's manufacturing sector.

For the reasons stated above, MACNY opposes S.4158 (Krueger) /A.48704-A (Simon).