



July 7, 2008

NYSERDA  
17 Columbia Circle  
Albany, NY 12203-6399

**Re: Draft Scope of 2009 New York Energy Plan  
May 30, 2008**

Dear Sirs or Madams,

Citizens Campaign for the Environment (CCE) is an 80,000-member, non-profit, nonpartisan, advocacy organization working to protect public health and the natural environment in New York, Connecticut and the nation. CCE works to build widespread citizen understanding and advocacy for policies and actions designed to manage and protect interdependent land and water resources, wildlife and public health.

CCE actively promotes policies and actions at the local, state, and federal level that reduce greenhouse gases and promote clean, renewable energy solutions. CCE applauds the New York State Energy Research and Development Authority (NYSERDA) and New York State Department of Environmental Conservation (DEC) for moving forward with the New York State Energy Plan process and for taking a necessary step towards meeting our energy needs in a responsible manner.

CCE supports New York State formulating an energy plan for the region. Having a plan for energy development in the state will benefit the environment, public health and our climate by meeting our energy needs in the most efficient, sustainable, and cleanest manner while providing regulatory certainty for energy companies in NYS. It is CCE's hope that the NYS Energy Plan will encourage the energy industry to invest in clean, sustainable, safe energy generation and dissuade ill-conceived energy proposals like Broadwater LNG floating barge proposal or the proposed 43 MW coal plant in Jamestown, NY.

*CCE offers the following specific comments on the draft scope:*

### **III. A. Draft Scope analyses and assessments**

CCE recommends that this section include a comprehensive analysis of the state's progress to comply with existing energy mandates including Executive Order 111 and the Renewable Energy Portfolio Standard. These measures identify specific timelines and objectives for the state with respect to renewable energy generation and consumption. The analysis should include an assessment of progress and pathways forward to meet these mandates.

Item K should include an assessment of state energy policies and programs that directly or indirectly hinder renewable energy technologies implementation.

### **(B) Issue Briefs**

#### **Meeting Future Energy Needs**

CCE believes that energy efficiency will play a significant role in providing “*negawatts*” in addition to the *megawatts* from power plants. The current description of “Meeting Future Energy Needs” does not seem to explicitly include efficiency and conservation.

This section should delineate pathways for New York State to actively promote public participation in energy efficiency and energy conservation endeavors. NY should look at other state's programs and assess “what works and what doesn't”. An energy plan must include strong public participation and involvement so that the public is part of the solution.

This section should include an evaluation of offshore wind power. Recently, Delaware signed the first power purchase agreement in the United States for an offshore wind farm, paving the way for 200 MW of clean, safe, renewable power. BlueWater Wind LLC has stated that this energy will be delivered at a cost **lower** than current electric costs generated by oil. New York State should aggressively pursue all renewable energy technologies and particular emphasis should be placed on large scale energy production from renewables. Large scale on-shore wind power is not readily feasible downstate due to high land values; however, offshore siting is a real, feasible alternative. The Long Island Power Authority (LIPA) is a public utility and therefore should be agreeable to state policies and objectives. This plan should explore LIPA's role in promoting offshore wind capabilities for New York State.

Additional offshore wind proposals are being considered for the Great Lakes. This potential resource should also be explored and evaluated.

Expanding solar power use and development should be a priority in residential, commercial, government, and non-profit sectors. Solar energy generation is uniquely

able to generate electricity during peak load, and can add to the stability of the grid while produce clean, renewable energy on-site. CCE supports rebates and incentives by municipalities, utilities, and state agencies to increase solar power in New York.

In addition, CCE believes that clean, domestically produced energy options should be stated as New York's top priority. Energy independence, clean energy production, combating global warming and providing for a sustainable energy future can not be accomplished with continued dependency on fossil fuels. Our plan should reflect and articulate an energy future that actively promotes, advances and seeks out clean energy technologies.

### **Energy Infrastructure Needs**

CCE strongly supports determining the true need for energy infrastructure, transport and supply in a comprehensive manner. The current system of waiting for energy corporations to submit proposals that agencies have to then either deny or approve is inefficient and chaotic. In addition, this system inadvertently facilitates energy policies and energy infrastructures that are crafted to serve interests of utility and energy companies, and not necessarily reflective of the public interest. A plan that is designed to meet our energy needs and is also mindful and protective of our environment, public health and societal values will help New Yorkers and policy makers with critical energy decisions.

### **Siting New Energy Infrastructure**

CCE believes that, in addition to examining the jurisdictional issues related to siting and utilizing transportation corridor rights-of-way, the siting brief should address aboveground vs. belowground transmission line tradeoffs and benefits.

### **Energy Costs and Economic Development**

Although "how New York may be positioned in a carbon-constrained economy" is mentioned, the energy plan should clearly include examine New York's position for growth industries associated with energy-independence, renewable energy, and green building practices within its scope.

### **Regional Energy Issues**

CCE is extremely supportive of a cooperative approach to energy issues. Our neighboring states of Connecticut and New Jersey should be included in regional energy planning, particularly because of shared resources including the Long Island Sound and the Atlantic Ocean. Said plan should include a new structure that provides for communication with Connecticut officials to discuss and conduct regional energy plans, particularly those that involve the Long Island Sound. For far too long, NY and CT have only sat down to resolve conflicts regarding energy infrastructure. We have as yet to work together collaboratively to advance a mutual energy agenda. This opportunity to collaborate can and should be advanced by NY. New Jersey should also be included in this energy collaboration. Multiple offshore LNG facilities are already proposed for off the coast of NY and NJ and number of proposals are likely increase in 2009. These proposals represent some of the largest energy supply infrastructures in the history of the

Northeast. The proposals range from supplying 1.2 bcf of natural gas per day to 2.4 bcf per day into the NJ and NY market. A meaningful dialogue with NJ is warranted.

In closing, CCE commends Governor Paterson and NYSERDA for committing to formulating an energy plan for the state. CCE appreciates the opportunity to comment on New York's proposed scooping for that plan and looks forward to further input in the future.

Sincerely,

Adrienne Esposito  
Executive Director

cc: Hon. David S. Paterson, Governor  
Pete Grannis, DEC Commissioner  
Peter Iwanowicz, DEC Climate Change Office Director  
Hon. Sheldon Silver, Assembly Speaker  
Hon. Robert Sweeney, Assembly Environmental Conservation Committee Chair  
Hon. Dean Skelos, Senate Majority Leader  
Hon. Carl Marcellino, Senate Environmental Conservation Committee Chair