July 07, 2008

State Energy Planning Board
Comments

NYSERDA
17 Columbia Circle
Albany, New York 12203-6399

Re: Draft Scope of 2009 New York State Energy Plan

Dear Mr. DeCotis,

New York Interfaith Power and Light (NYIPL), along with its affiliates, is a statewide interfaith 501 (c)(3) organization that is paving the way for New York’s faith communities to act on the issue of global warming and climate disruption.

As part of that effort we are a member of the Alliance for Clean Energy New York (ACE NY). ACE NY has sent you comments on the Draft Scope, which we have reviewed and support.

Additional comments that we have pertain to areas that have historically been provided little or no attention within the State Energy Plan. (iii) the needs of vulnerable communities; (iv) consumer cost impacts;

These are as follows:

1. **Impact on the Poor**

NYIPL has come to understand that the concerns of the faith communities across NY on the issue of global warming center around the knowledge that the first to be impacted by the environmental catastrophe of global warming and climate disruption are the poor. This is true globally as well as within New York State. Within NYS, in order to understand the impact of State Energy Policies on the poor, it is necessary to evaluate and understand how those needs are currently being met. We would strongly urge that each portion of the SEP be responsive to this issue.

It is important to define the geographic distribution of the poor within NYS. An evaluation within the SEP of New York’s poor communities and the diverse infrastructure responding to their energy needs is necessary to more clearly define the impacts of the SEP on New York’s poor.
With this in place, the SEP should attempt to define the elements of its program that would reduce or eliminate any increased cost to the poor within NYS, while achieving the goals of the plan.

The SEP should highlight the historic environmental injustice to the poorer communities of NYS and how a new SEP might move toward correcting this injustice by providing clean affordable energy.

2. **Sustainability**

NYIPL believes that broader principles of sustainability need to be incorporated into every section of the SEP.

We appreciate, for example, that you will be considering transportation issues, including “issues related to local, state or regional efforts to reduce vehicle miles traveled.” If possible, we suggest extending your scope to include land use issues that affect energy use in transportation, such as Smart Growth, Transit-Oriented Development, etc.

Another example might be our food consumption. Many within the faith communities and elsewhere have come to recognize the energy and climate impacts of the distance that food travels before it reaches our tables. With this defined, the SEP might conclude that its policies should support a food supply that is more locally based.

NYIPL looks forward to working with the Board in the construction of a State Energy Plan that is:

- Responsive to the issue of global warming and climate disruption as a primary, overarching theme throughout the plan (not just one Issue Brief),
- Protects the economic and environmental welfare and health of New York’s poor, and
- Based on principles of sustainability, from both a New York State and a global perspective.

Sincerely,

Nicola Coddington
Executive Director

Edward Bennett
President