

SECTION 1.3

ENERGY POLICY OBJECTIVES AND RECOMMENDATIONS

INTRODUCTION

The State Energy Plan provides statewide policy guidance for energy-related decisions by government and private market participants within the State. With regard to State government, all energy-related actions and decisions by State agencies, Boards, Commissions, and Authorities are required by statute to be reasonably consistent with the forecasts, policies, and long-range planning objectives and strategies contained in the Energy Plan. Ideally, the State Energy Plan will guide the development of operational and program plans of State entities in fulfillment of their missions.

The Energy Planning Board's long-range planning objectives and strategies put New York on a path toward increased energy self-sufficiency while, at the same time, supporting a flexible, market-based approach to growing the State's economy and improving transportation systems and the environment. The strategies are presented in this Section and are grouped according to the primary objective that the strategies most directly support. Several recommendations support multiple objectives.

These strategy recommendations help New York State achieve the public policy objectives of the Energy Plan. In the future, however, additional analyses of some recommendations will be required prior to their implementation. Such analyses will take into consideration likely effects on energy costs, energy systems security and fuel diversity, protection of public health and safety, beneficial and adverse environmental impacts, and the State's ability to compete economically. Although the Planning Board supports movement toward all of the stated objectives, it recognizes that some of the recommendations conflict with one another. In these cases, a balance needs to be established that moves toward the broad policy objectives over time without significantly impeding progress toward the collective objectives. Although not required by law, the Energy Planning Board has instructed the agencies' staffs to report annually to the Board on the implementation status of recommendations, and update information, assumptions, and conditions that might affect the continued feasibility of specific recommendations and initiatives in the Energy Plan. In such instances where underlying assumptions and conditions might have changed, or where continued pursuit of one policy objective might significantly impede progress or undermine another, the Energy Planning Board will reconsider the pace of progress and act accordingly to maintain balance.

Summary Overview

The Energy Plan establishes a vision for New York's future that relies on existing and new energy resources, including increased improvements in energy efficiency and demand reduction strategies in buildings, industrial processes, and transportation, and places greater reliance on indigenous and renewable-based energy resources for electricity generation and transportation. The State recognizes the importance of maintaining and expanding the existing energy and transportation infrastructure and siting new electricity generation capacity to meet the demands of a growing economy.

The State is investing in this vision through reliance on flexible, market-based energy policies, a statewide public benefits program, research and development efforts administered by the New York State Energy Research and Development Authority (NYSERDA), and energy efficiency and renewable energy programs offered by the New York Power Authority (NYPA) and Long Island Power Authority (LIPA). In addition, the State Public Service Commission and the Departments of Environmental Conservation, Transportation, and Economic Development are reviewing regulations and policies and contemplating additional initiatives to meet the State's energy, environmental, transportation, and economic development needs.

In general, to meet the demands of New York's growing economy, the Energy Plan recognizes the need for between 5,000 and 7,000 MW of additional electricity supply and demand reduction resources during the early years of the planning period, and the need for new natural gas pipeline capacity to meet the growing demands for gas in all sectors of the economy, particularly in electricity generation. The Energy Plan adopts an energy efficiency goal of reducing primary energy use per unit of Gross State Product (GSP) 25% below the 1990 level by 2010. This is equivalent to reducing total primary energy use by approximately 150 Tbtu annually by 2010. For comparison purposes, this reduction represents approximately 20% of motor gasoline used in New York each year. In addition to the energy efficiency goal, the Energy Plan adopts a renewable energy goal of increasing the share of renewable energy use 50%, by 2020, as a percentage of total primary energy use. This would increase renewable energy as a percentage of primary energy use from 10% currently, to 15% by 2020. This is equivalent to increasing renewable energy use by 240 Tbtu by 2020. For comparison purposes, this reduction represents approximately one-third of the motor gasoline use in New York each year. The energy efficiency and renewable energy use goals apply across all energy using sectors, including transportation, electricity generation and buildings. The State is charting a course that will allow it to lead the nation in use of distributed generation technology by all economic sectors, and the State is developing a viable and sustainable

bio-fuels industry in New York. Notably, the Energy Plan calls for greenhouse gas (GHG) emission reductions of 5% below 1990 levels by 2010, and 10% below 1990 levels by 2020.

Strategies for achieving these goals and other public policy objectives are provided in the following section. The Energy Planning Board will review progress toward these and other energy policy goals and objectives periodically and determine whether additional actions need be taken to balance multiple competing interests.

1. Supporting the continued safe, secure, and reliable operation of the State's energy and transportation systems infrastructures.

- A. The State will continue its study of the security of New York's energy infrastructure used for production, storage, and delivery. The study will include a risk and vulnerabilities assessment and recommendations for appropriate actions and will be conducted cooperatively by the Office of Public Security, appropriate Energy Planning Board agencies, and major energy market participants, in cooperation with appropriate federal agencies.
- B. The State supports investments in natural gas and electricity transmission and distribution system infrastructures, including consideration of multiple redundancies, shared design practices, shared inventories, and flexibility necessary to ensure continued safe and reliable system operation.
- C. The State requests that the New York Independent System Operator (NYISO) consider the certainty and availability of primary and backup fuels in valuing capacity from electricity generators in order to ensure that the reliability of the electricity, natural gas, and petroleum supply and delivery infrastructures would not be adversely affected if generator fuel supplies are disrupted. As an alternative, NYISO should consider the certainty and availability of primary and backup fuels in establishing local reliability rules.
- D. The State supports greater energy diversity in all sectors of the economy through investments in technology and infrastructure development for indigenous and renewable fuels, demand reduction techniques, and energy efficiency, to reduce the risks associated with single fuel dependency and price volatility. In addition, the State supports the continued safe operation of nuclear, coal, natural gas, oil, and hydroelectric generation as part of a diverse portfolio of electricity generation resources.

- E. The State will continue its efforts to reduce traffic congestion and delays and increase energy efficiency in transportation through a complement of actions that include supporting public transit, transportation management, intelligent transportation systems, and capital construction.
 - 1. The State will work to ensure that transportation planning and construction is compatible with current and planned community development.
 - 2. The State supports expanding intermodal freight capabilities as a means to reduce transportation sector energy use.
 - 3. The State's emphasis on maintaining its existing transportation infrastructure through capital construction programs will be continued.
 - 4. The State will work more closely with utility companies to better identify and, if possible, design project work around utility facilities. The State will work in partnership with municipal governments to accomplish this objective for municipal projects.

2. Stimulating sustainable economic growth, technological innovation, and job growth in the State's energy and transportation sectors through competitive market development and government support.

- A. The Energy Planning Board recommends reauthorization of Public Service Law (PSL) Article X, scheduled to expire on January 1, 2003, relating to the siting of new major electric generating facilities. As part of this process, the following issues should be considered:
 - 1. Increasing support for public participation in the Article X siting process through creation of an Office of Public Advisor to assist and advise interested parties and members of the public regarding participation in the siting and certification processes for major electric generating facilities. State agencies should continue their pre-application information programs and training workshops for prospective applicants and affected communities.
 - 2. Evaluating the effectiveness of current statutory language providing for intervenor funding, giving consideration to providing funding at the time of project preliminary scoping, and allowing broader use of intervenor funding.

3. Evaluating the appropriateness of developing specific procedures with respect to the expansion, modification, or repowering of existing major generating facilities.
 4. Additional modifications and measures to Article X's procedural requirements that would enable the Siting Board to streamline its review where interested parties, including affected community groups, have reached consensus as to the specific issues presented by an Article X application.
 5. Adding the New York State Department of State and the New York State Office of Parks, Recreation, and Historic Preservation as statutory parties to Article X proceedings in order to coordinate relevant permit requirements for Article X applications.
- B. The Energy Planning Board recommends reauthorization of Article 6 of the Energy Law, for statewide energy planning, scheduled to expire on January 1, 2003. Modifications should include reducing the forecasting period for energy demand and prices from 20 years to 10 years and changing statutory language to reflect changes in the electricity industry. In addition to statutory modifications, the following administrative steps should be taken:
1. The Energy Planning Board should meet annually to coordinate development and implementation of energy-related strategies and policies, receive reports from the agencies' staffs on the compliance of major energy suppliers with its information filing requirements, and receive summary reports on the information filed.
 2. The information filing regulations of the Energy Planning Board should be modified to recognize new entrants into the energy marketplace and the need for pertinent energy-related information and data.
- C. The State supports working expeditiously toward establishing a regional market in the Northeastern portion of the country.
1. The State will continue to participate in negotiations to bring about a larger, regional common market in order to ensure the incorporation of best practices of the NYISO and fair representation by market participants, including affected state governments, within the common market governance structure.

2. Any system developed for merging the NYISO into a larger market must be designed to incorporate appropriate State and local reliability requirements and ensure that short-term economic pressures do not adversely affect the reliable operation of New York's integrated electric system. In addition, any future system must allow full participation of demand management resources in the competitive procurement process.
- D. The State will move expeditiously to a fully-competitive retail electricity marketplace while maintaining appropriate customer service protections.
 1. The State supports the unbundling of electricity services and implementing statewide competitive services for metering, billing, and other services for which competition has the potential to lower costs and improve service quality.
 2. The State will stimulate technological and institutional solutions that promote price responsive load management and load control technologies for all customer classes as appropriate, paying particular attention to the multifamily residential sector throughout New York State. The State supports the use of interval meters, where appropriate, to enable customers to respond to real-time electricity prices.
 - E. The State, in coordinating rebuilding efforts in lower Manhattan with private developers following the terrorist attacks of September 11, 2001, must ensure that these efforts maximize the use of energy-efficient and environmentally-sound transportation services and building design and construction practices to reduce energy use and costs, and emissions.
 - F. The State will continue to strive to reduce energy costs for all New Yorkers with the expectation of narrowing the disparities between New York's costs and costs in other states and regions of the country.
3. **Increasing energy diversity in all sectors of the State's economy through greater use of energy efficiency technologies and alternative energy resources, including renewable-based energy.**
 - A. The State supports significantly increasing energy resource diversity in electricity generation and transportation through increased reliance on indigenous, renewable, energy efficiency, and demand management resources.

1. The State adopts the goal of reducing statewide primary energy use in 2010 to a level that is 25% below 1990 energy use per unit of Gross State Product (GSP). In addition, the State adopts the goal of increasing the share of renewable energy as a percentage of primary energy use 50% by 2020, up from 10% in 2000 to 15% in 2020.
 - a. The State should competitively solicit 60 to 120 MW of renewable electricity generation to meet the requirement of the Governor's Executive Order No.111, which requires up to 10% of State facilities' electricity be provided from renewable resources by 2005 and 20% by 2010.
 - b. The New York Power Authority (NYPA) should competitively solicit bids for long-term contracts for the purchase of 100 MW of electricity capacity from renewable energy resources. In addition, NYPA should increase its annual investment in energy efficiency by 25% and continue to cooperate with NYSERDA and the Long Island Power Authority in program offerings and delivery.
 - c. The Long Island Power Authority (LIPA) should competitively solicit bids for long-term contracts for the purchase of 100 MW of electricity capacity from renewable energy resources. In addition, LIPA should increase its annual investment in energy efficiency by 25% and continue to cooperate with NYSERDA and NYPA in program offerings and delivery.
2. NYSERDA will examine and report on the feasibility of establishing a statewide renewable portfolio standard (RPS) for electricity generation, assess the economic impacts of an RPS, and determine whether and how an RPS might be harmonized with a restructured and competitive electricity market and the goals from planned State actions to promote renewable energy development.
3. The State encourages greater use of indigenous fuels and renewable-based electricity generation by pursuing appropriate regulatory reform initiatives, wider application of net-metering programs where appropriate, continuing review of interconnection requirements, consolidating and enhancing tax incentives, and supporting development of a renewable fuels industry in New York.

4. The State supports expanding bio-fuels research and development activities with the goal of creating a self-sustaining private sector bio-fuels industry in the State within the next 5 to 10 years. The State will develop a specific plan for producing, refining, and marketing biomass fuels derived from waste, soybean, and corn oils, and from paper sludge, municipal solid waste, and other cellulose sources, working in cooperation with other states. The State supports the commercialization of bio-fuels technology and use of bio-fuels as vehicle fuel, heating fuel, emergency electricity generation fuel, and in marine applications.
 5. The State supports research, demonstration, and commercialization of advanced electricity generating technologies and encourages the retrofit or repowering of existing generating facilities in the State to maintain the State's energy diversity.
- B. The State supports the development and use of distributed generation (DG) and combined heat and power (CHP) technologies at customer sites, with the goal of becoming a national leader in the deployment of clean distributed generation technology. Primary focus should be on applications where such technologies can be shown to reduce energy costs, improve electricity system reliability, and reduce harmful pollutant emissions.
1. The State should continue its research and development support for DG and CHP technologies and applications, supporting, in particular, clean and renewable energy-based DG and CHP technologies.
 2. The State should take all reasonable steps necessary to facilitate the interconnection of DG and CHP resources into the electricity system and increase the use of DG and CHP resources in the State.
 3. The State should offer investment tax credits to spur private sector investment in environmentally-sound and cost-effective DG and CHP technologies.
- C. The State supports fuel neutrality in its support for alternative-fueled vehicle technology. The New York Alternate Fuels Tax Credit program, scheduled to expire on February 28, 2003, should be extended and consideration given to enhancing it by including all types of alternative-fueled vehicles. Incentives should also be considered to support the development of an alternative fuels infrastructure in New York.

- D. The State supports federal surface transportation legislation that leads to more energy-efficient transportation. Specific elements should include increased federal funding for transit, retention of the Congestion Mitigation and Air Quality program, continued funding for intelligent transportation systems and transportation systems operations, and modification of the Federal Transportation Equity Act for the 21st Century (TEA-21) programs to improve rail service.
- E. The State encourages the Federal government to adopt new corporate average fuel economy standards for vehicles to address vehicle energy efficiency in a way that protects driver and passenger safety.

4. Promoting and achieving a cleaner and healthier environment.

- A. The State should continue to develop and implement strategies to reduce environmental impacts from stationary sources of pollution. These should include:
 - 1. Work with industry to promulgate emission standards for distributed generation.
 - 2. Implement the Governor's Acid Deposition Reduction Program, which is expected to significantly reduce GHG emissions and the acid rain precursor SO₂ and NO_x.
 - 3. Provide expedited permitting procedures to encourage siting of electric generation facilities that minimize aquatic and air quality impacts.
 - 4. Work with federal government to develop national strategies to reduce multi-pollutant emissions from electric generating facilities.
 - 5. Use System Benefit Charge funding to promote the development of clean energy generation technologies.
- B. The State should continue to develop and implement innovative strategies to reduce environmental impacts from mobile sources of pollution. These should include:
 - 1. Work with automobile and truck manufacturers to develop new technologies to reduce emissions from such vehicles, and to promote the introduction of such technologies into the marketplace.

2. Promote the introduction of clean fuels, including renewables, low-sulfur diesel, and other alternative fuels by purchasing vehicles that use such fuels for use in the State fleet and developing incentives to encourage their use in the private sector.
- C. The State should proceed to phase out the use of methyl tertiary butyl ether (MTBE) as an oxygenate additive in motor gasoline as required by State law. At the same time, the State will seek Federal relief from the oxygenate requirement. The State will begin supporting infrastructure development for an indigenous and renewable-based substitute for MTBE in the event that relief is not provided. The State should recommend strategies for building and supporting such an infrastructure and industry in New York.
- D. The State should lead the nation in taking actions to reduce greenhouse gas emissions, stressing the aggressive implementation of existing, and development of new technologies and strategies that would significantly reduce emissions. The State should build upon its successes to date in promoting energy efficiency and renewable energy technologies and transportation strategies, that have helped New York become the most energy-efficient state in the continental U.S., and a significant developer of renewable energy, which already accounts for 15% to 18% of the State's electricity generation and 10% of primary energy use. The State will continue to evaluate the economics and environmental benefits of the recommendations of the Governor's Greenhouse Gas Task Force, and in the interim, adopts the following recommendations.
1. Commit to a statewide goal of reducing greenhouse gas (GHG) emissions 5% below 1990 levels by 2010, and 10% below 1990 levels by 2020.
 2. Develop a GHG emission registry program for registering base-line GHG emissions and emission reductions from actions implemented at facilities.
 3. Emphasize the greenhouse gas emission reduction potential, most notably of carbon dioxide (CO₂), as a criterion in developing new program initiatives in the State's public benefits programs.
 4. Expand the State's efforts to improve the efficiency of electricity generation and encourage use of indigenous and renewable energy resources, including solar, wind, waste methane, geothermal, sustainable biomass, combined heat and power, clean and efficient distributed generation.

5. Adopt a specific plan to develop an indigenous bio-fuels industry in New York to produce, refine, and market transportation and other fuels from indigenous biomass resources.
6. Develop a program that allows businesses to enter into voluntary agreements to meet certain energy efficiency targets and reduce greenhouse gas emissions. To assist businesses in meeting such voluntary agreements, the State should offer technical assistance, public recognition, expedited regulatory permit review, and financial incentives, as appropriate or necessary.
7. Redirect transportation funding toward energy-efficient transportation alternatives, including public transportation, walking, and bicycling, and provide incentives to encourage greater use of related alternatives that improve transportation efficiency.
8. Include in the State transportation planning and State Environmental Quality Review Act (SEQRA) related processes, consideration of CO₂ production and mitigation strategies, as appropriate.
9. Target open space funding to prevent suburban sprawl, promote Quality Communities, reduce vehicle miles traveled, and support, adopt, and enhance transportation measures that reduce energy use and pollutant emissions.
10. Support, adopt, and enhance transportation measures that reduce energy use and pollutant emissions, such as Commuter Choice, Ozone Action Days, diesel vehicle retrofits, improved traffic signal coordination with light emitting diode (LED) replacement technology, transportation system management, and other similar actions.
11. Encourage low-cost, passive building efficiency measures, such as white roofs, passive solar design, and improved foundation membranes, and incorporate such measures in the State's building construction codes. In addition, the State should support local building and development projects that include funding for open space conservation and urban forestry and that reduce the need for air-conditioning in urban "heat islands."

12. Expand research, development, and demonstration (RD&D) of energy and GHG-efficient vehicle technologies, add GHG goals to vehicle tax credits and incentives, and coordinate with other states to encourage improvements in vehicle fuel economy.
13. Working with regional and local planning organizations, analyze and quantify the energy use and air pollution emissions expected to result from transportation plans and programs.
14. Support the design and construction of energy-efficient and environmentally-friendly “green buildings” through financial incentives, technical assistance, and related program initiatives.

5. **Ensuring fairness, equity, and consumer protections in an increasingly competitive market economy.**

- A. The State will examine the feasibility of effectively aligning public policy interests in energy efficiency, combined heat and power, and indigenous and renewable-based electricity generation with the financial interests of distribution utilities and their customers.
- B. The State supports expediting efforts to have electricity distribution and customer service prices to consumers reflect the true cost of service and eliminate inter-class and intra-class subsidies, to the extent practicable.
- C. The State should review the recommendations from the Department of Environmental Conservation’s Environmental Justice Advisory Group and implement appropriate recommendations in a timely manner.
- D. The State encourages agencies to consider the effectiveness, efficiency, and coordination of their low-income energy assistance programs, including the **New York Energy \$martSM** program, the Weatherization Assistance Program, the Low-Income Home Energy Assistance Program, and other State programs that offer incentives, assistance, and information services to improve the efficiency of energy use and reduce the energy burden of low-income households. The State should consider consolidating programs where opportunities exist to improve administrative efficiency and customer service.

Table A-1: Participants in Interest Group Meetings During Energy Plan Development

<p><i>AES Westover, LLC</i> <i>American Wind Energy Association</i> Assisted Environmental Decisions Association for Energy Affordability <i>Business Council of New York State, Incorporated</i> Central Hudson Gas and Electric Corporation Citizen’s Awareness Network <i>Citizens Campaign for the Environment</i> <i>Communities United for Responsible Energy</i> <i>Consolidated Edison Company of New York, Incorporated</i> <i>Consumer’s Union</i> <i>Couch White, LLP</i> <i>Dynegy, Incorporated</i> <i>East River Environmental Coalition</i> Empire State Petroleum Association <i>Energy Association of New York State</i> <i>Environmental Advocates</i> <i>Environmental Defense</i> <i>Ford Motor Company</i> <i>Honorable Joseph R. Lentol, New York State Assemblyman, 50th Assembly District</i> <i>Honorable Paul D. Tonko, New York State Assemblyman, 105th Assembly District</i> <i>Hudson River Sloop Clearwater, Incorporated</i> <i>Independent Power Producers of New York, Incorporated</i> <i>Integrated Waste Services Association</i> KeySpan Energy Corporation <i>Long Island Association, Incorporated</i> <i>Long Island Power Authority</i> <i>Mirant Corporation</i> Mr. Chuck Dworkin, Esq. <i>Mr. Guy Merckx</i> <i>Mr. Robert A. Smith</i> <i>Mr. Sigmund F. Zakrzewski, Ph.D.</i> <i>Ms. Pamela Slater</i> <i>Ms. Lois M. Sturm</i> <i>Mother Earth Research</i> <i>Multiple Interveners</i></p>	<p><i>National Association of Energy Service Companies</i> National Fuel Gas Company <i>Natural Resources Defense Council</i> New York City Corporation Counsel New York City Department of Environmental Protection <i>New York City Economic Development Corporation</i> New York City Environmental Justice Advocates <i>New York City Environmental Justice Alliance</i> <i>New York Gas Group</i> <i>New York Independent System Operator</i> <i>New York Lawyers for the Public Interest, Incorporated</i> New York Power Authority <i>New York Public Interest Research Group</i> <i>New York State Electric and Gas Corporation</i> <i>New York State Office of the Attorney General</i> <i>Niagara Mohawk Power Corporation</i> Orange and Rockland Utilities, Incorporated Orion Power Holdings, Incorporated <i>Pace Energy Project</i> <i>Riverkeeper, Incorporated</i> Rochester Gas and Electric Corporation <i>Sierra Club, Atlantic Chapter</i> <i>Sierra Club, Niagara Chapter</i> Site Energies, Incorporated Small Customer Marketer Coalition <i>Stop the Barge</i> Sustainable South Bronx The Point Community Development Corporation <i>Uprose</i> <i>Western New York Sustainable Energy Association</i> <i>Williamsburg Watch</i></p>
<p><u>Notes:</u> Regular text indicates Outreach Meeting attendance only. <i>Italic text indicates submission of written comments only.</i> Bold-faced and italicized text indicates both Outreach Meeting attendance and submission of written comments. Forty-seven sets of comments were received from 43 parties.</p>	

TABLE A-2: Commentors to Draft State Energy Plan

Name	Organization	Comments
Acker, Dr. William P.	MTI MicroFuel Cells Inc.	Written
Alford, Tahira Faune	Individual	Oral
Allan, Janet	Individual	Oral
Ames, Oakes	Environmental Advocates of New York	Oral
Anuszkiewicz, Mr.	Individual	Oral
Arcarese, Jo Ann	Individual	Written
Arceo, Thelma	Community Environmental Center, Senior Manager	Oral
Armentano, Joseph	Paraco Gas of Purchase, New York	Written/Oral
Babbie, Jason K.	New York Public Interest Group, Inc. (NYPIRG)	Written/Oral
Babiuk, Stanley A.	El Paso Corporation	Written
Barrett, Marshah-Reaff	Individual	Written
Bashaw, Bryan J.	Comlinks Neighborhood Revitalization Program	Written
Beckwith, Herbert S.	A.E.S. New York	Oral
Beller, Jeff	Biofuels America	Oral
Belluso, Rhonda	Individual	Written
Bertoni, Frank	Individual	Written
Bolbrock, Richard J.	Long Island Power Authority (LIPA)	Written/Oral
Bostaph, Jennifer	Individual	Written
Bradbury, David	Individual	Oral
Breyman, Steve	Environmental Advocates of New York, Board of Directors	Oral
Brown, Carolyn	Independent Power Producers of New York (IPPNY)	Oral
Brown, Ruben S.	Joint Supporters; includes The E Cubed Company, LLC; Distributed Power Coalition of America; KeySpan Technology, Inc.; RealEnergy, Inc.; Capstone Turbines, Integrated Energy Concepts Engineering P.C.	Written/Oral
Browning, Kenya	Individual	Written
Bubbins, Harry J.	Bronx Environmental Action Coalition	Written
Bucci, Richard	City of Binghamton	Oral
Burdis, Linda Anne	Pace University School of Law, Pace Energy Project, New York Shines	Oral
Buxbaum, Diane	Sierra Club, New York City	Oral
Buzel, Mark	A.E.S. New York	Oral
Cala, Erin	Individual	Oral
Cardell, Cathy	Individual, member Citizens Awareness Network	Oral
Carey, Timothy S.	Battery Park City Authority	Written
Carrier, Rick	Bald Eagle Power Company, Inc.	Written/Oral
Casey, Charles J./Catalano, Joan	Northfield Community L.D.C.	Written
Catapano, Lisa M. - et al. (335)	Natural Resources Defense Council (NRDC)	Written
Caumont, Susan	Individual	Oral
Cavazzini, Monica	Better Queens Environment; Coalition to Help Organize a Kleaner Environment (CHOKE)	Oral
Cernik, Christopher	Multiple Intervenors	Written/Oral
Chao, May M.	New York State Consumer Protection Board	Written/Oral
Chender, Amy	Individual	Written
Clagett, William H.	New York State Reliability Council	Written
Clark, Brian	Manufacturers Association of Central New York, Inc.	Written/Oral
Clark, Francis	New York Public Interest Research Group (NYPIRG)	Oral
Contino, Cartherine	Student Activist, SUNY Albany, Niagara chapter of NYPIRG	Oral

Name	Organization	Comments
Cooper, Alix	Individual	Written
Corneau, Keith F.	Adirondack Hydro Development Corporation	Written
Cornell, Harriet	Rockland County Legislature	Written
Crandell, Stacy	Individual, member Citizens Awareness Network	Oral
Crossett, Susan	Niagara Mohawk, a National Grid Company	Oral
Cullen, Katie	Integrated Waste Services Association	Written/Oral
Cullen, Scott	Star Foundation	Oral
Cullinane, Beth	Better Queens Environment	Written
D'Arco, Lawrence	Individual	Written
Davis, Diane A.	Individual	Written
Davis, Stephen G.	Individual	Written
Davoli, Michael	New York Public Interest Research Group (NYPIRG)	Oral
Day, William L.	Binghamton University	Written
DeAngelis, Pat	Individual	Oral
Deperio, Jessica	New York Public Interest Research Group (NYPIRG)	Oral
Donohue, Gavin	Independent Power Producers of New York (IPPNY)	Oral
Downs, Roger	Individual	Oral
Duffy, Timothy	New York Independent System Operator (NYISO)	Written/Oral
Dunlea, Mark	Green Party of New York State	Written/Oral
Durr, Eric	Independent Power Producers of New York (IPPNY)	Written/Oral
Dworkin, Marc	NRG Energy Inc.	Written
Ebenhack, Ben W.	Individual	Written
Ellsworth, Kathryn	Mayor, Village of Montebello	Written
Elmer, Fred	Individual	Oral
Esposito, Peter	Dynegy Inc.	Written/Oral
Evans, Dr. Richard	Individual	Written
Evans, Richard	Individual	Written
Evers, Johnny	Business Council of New York State, Inc.	Written/Oral
Ewing, Alexander - et al.	Individual	Written
Fancher, Michael	Albany NanoTech, the University of Albany	Written/Oral
Fargnoli, Connie	Individual	Oral
Feiner, Paul	Town of Greenburg	Written
Ferraro, Francis A.	Wheelabrator Technologies, Inc.	Written
Foley, Elizabeth	New York Public Interest Research Group (NYPIRG)	Oral
Ford, Elsa	Brentwood-Bay Shore Breast Cancer Coalition	Oral
Foster, Robert	Citizens Campaign for the Environment (CCE)	Written
Freeman, A. Myrick	Clean Air Task Force, Analysis of the Pataki Power Plant Proposal vs. Full Environmental Comparability Using the New York Externalities Cost Model -- Final Report	Written
Gateley, Susan Peterson	Lake Shore Environmental Action of Wolcott	Written
Gerosa, Alix	Scenic Hudson, Inc.	Written/Oral
Glaser, Dani	Individual	Oral
Glover, Deborah Marie	Individual	Written
Golden, Melanie	Individual	Written
Goldstein, Andrew	Green Party, Erie County	Oral
Golemboski, William	Innovative Energy Solutions	Oral
Goodman, Doug	Individual	Oral
Green, Justin	Individual	Written
Greene, Manna Jo	Hudson River Sloop Clearwater	Written/Oral
Griffen, Mary	Individual	Written
Guerrier, Wedlyne	Individual	Written

Name	Organization	Comments
Gupta, Ashok	Natural Resources Defense Council (NRDC)	Oral
Gupta, Ashok, Director, Air and Energy Program; Katherine Kennedy, Senior Attorney; Alexander L. Perera, Research Associate (NRDC); Paul Elston (NYLCV)	Natural Resources Defense Council (NRDC), New York League of Conservation Voters	Written
Haase, Walter	City of Jamestown, Board of Public Utilities	Written/Oral
Hall, Marah	New York Power Authority	Oral
Harris, L.A.	Individual	Written
Harris, Linda	Hudson River Sloop Clearwater, Inc.	Written/Oral
Harris, Wendy	Individual	Oral
Hartman, Donald	IST Imaging & Sensing Technology	Written
Hassig, Donald	Cancer Action, New York	Oral
Helme, Edward A.	Center for Clean Air Policy	Written/Oral
Hepinstall, David	Association for Energy Affordability	Written/Oral
Hernandez, Kristian	51st Assembly District, representing Assemblyman Felix W. Ortiz	Oral
Hipius, Joseph J.	Niagara Mohawk, A National Grid Company	Written/Oral
Holsapple, John G.	Environmental Energy Alliance of New York	Written
Jaffee, Ellen	Rockland County Legislature	Written
Jones, Daniel	Individual, member of NYPIRG Board of Directors	Written
Kamen, Ron	Individual	Written
Kane, Raymond	Torne Valley Preservation Association	Written
Kaplan, Eve	North Fork Environmental Council	Oral
Kaplan, Gitelle	Better Queens Environment	Oral
Kaplowitz, Michael B.	Westchester County Board of Legislators	Written/Oral
Kelley, Roger	Independent Power Producers of New York (IPPNY)	Written/Oral
Kenny, Cathy A.	New York State Petroleum Council	Written/Oral
Kiefer, D.	League of Women Voters of Tompkins County	Written
Kiley, Thomas	New York Gas Group (NYGAS)	Written/Oral
King, Peter	Individual	Oral
King, Susan	American Ref-Fuel®, Director of Government Affairs	Written
Klein, Art	Adirondack Mountain Club, Sierra Club	Oral
Kniffin, Kevin	Green Party	Written/Oral
Koganeya, Toshijuki	Individual	Written
Kralovich, Joseph	Old Lindenmere Civic Association, Merrick	Oral
Kreshik, Petra	New York State Office of Parks, Recreation and Historic Preservation	Written
LaBine, Bill	Renewable Energy Works	Oral
LaCen, Ramona	Individual	Oral
Lake, Howard	A.E.S. New York	Oral
Lambert, Robert	Individual	Written
Leidig, David	Individual	Written
Leonard, Ron	New York State Renewable Energy Coalition	Oral
Lewis, Neal	Long Island Neighborhood Network	Oral
Leyden, Tom	Power Light Corp.	Oral
Link, Ann	Individual	Written/Oral
Little, James	Individual	Oral
Logan, Timothy	New York City Environmental Justice Alliance, NYS Sustainable	Oral

Name	Organization	Comments
	Energy Campaign, Communities United for Responsible Energy, New York Citizens Utility Board	
Loughney, Robert M.	Multiple Intervenors, COUCH WHITE, LLP	Written
Lowe, Leslie H./Logan, Timothy J.W.	New York City Environmental Justice Alliance	Written
Lupardo, Donna	Individual	Oral
Lynch, Mark	Mirant New York	Written/Oral
Madronero, Dorice	Rockland County Conservation Association, Inc.	Written
Makarowski, Katie	Individual	Oral
Mangano, Joseph J.	Radiation and Public Health Project (RPHP)	Written/Oral
Manning, David	KeySpan Corporation	Oral
Marner, Eugene	Individual	Oral
Maskin, Daniel	New York State Community Action Association; New York State Weatherization Directors' Association; Family Development Association of New York State	Written/Oral
Masters, Deborah	Stop the Barge	Written/Oral
Maxwell, Brett	Individual	Written
McConnell, Shawn	New York Public Interest Research Group (NYPIRG)	Oral
McCorry, Timothy	Individual	Oral
McCray, Nathaniel	Citizen Campaign for the Environment	Written
McCullough, Kathryn Cook	Hudson River Sloop Clearwater, Inc.	Written
McGarvey, James	New York State Weatherization Program	Oral
McGinnis, Jocelyn	New York Public Interest Research Group (NYPIRG)	Oral
McKinney, Megan	Green Party, Broome County	Oral
McManus, Mike	Innovative Energy Solutions	Oral
Mercincavage, C. Michael	Individual	Oral
Michael, Jerry/Alvaire	Individual	Written/Oral
Miller, Gail M./Suchman, E. Gail	Communities United for Responsible Energy (CURE), New York Lawyers for the Public Interest, Inc.	Written
Miller, Richard B.	New York City Economic Development Corporation	Written/Oral
Miquet, Annie Wilson	Individual	Oral
Moore, Jesse	Individual	Oral
Mulligan, Jim	A.E.S. New York	Oral
Museler, William J.	New York Independent System Operator (NYISO)	Written/Oral
Neuroth, Don	Individual	Oral
Oates, Joseph P.	Consolidated Edison Company of New York, Inc. and Orange and Rockland Utilities, Inc.	Written/Oral
Ortiz, Assemblyman Felix W.	51st Assembly District	Written
Panzarella, Carl	NHS of South Buffalo, Inc.	Oral
Parent, Belinda J.	Joint Council for Economic Opportunity, Inc.	Written
Patasaw, Natalie	Individual	Written
Pendzich, Marie	Sierra Club, Long Island Group	Written/Oral
Pereira, Anthony	Alternative Power, Inc.	Oral
Perera, Alexander	Natural Resources Defense Council (NRDC)	Oral
Picardi, Matthew J./Esposito, Peter	Dynegy Inc.	Written
Pijacki, Mark D.	National Fuel Gas Distribution Corporation (NFGDC)	Written/Oral
Plessner, Laura	Torne Valley Preservation Association	Written
Quinn, Peter	Long Island Coalition for Democracy	Written
Quinn, Peter	Sustainable Energy Alliance; Suffolk County Electrical Agency; Long Island Coalition for Democracy	Oral

Name	Organization	Comments
Rabin, Kyle	Riverkeeper, Inc.	Written/Oral
Ramos, Nelson	Sunset Park Redevelopment Committee	Oral
Ramsey, Lynn	Bald Eagle Power Company	Oral
Reutling, Karl	Lewis County Opportunities, Inc.; New York State Weatherization Program Public Action Committee	Written/Oral
Montblan, J. Reyes, Gregory J./ Funk, Peter/West, Donald	Cooperative Coalition to Prevent Blackouts c/o HDFC Council	Written
Reynolds, Anne K.	Environmental Advocates of New York	Written/Oral
Rice, Wendell	Weatherization Assistance Program, Bedford-Stuyvesant Restoration Corporation (BSRC-WAP)	Oral
Rieber, Dan	Northern Manhattan Weatherization Corporation	Written/Oral
Robbins, Julie	Environmental Advocates of New York	Oral
Rodriguez, Hector	Scenic Hudson Inc.	Written
Rodriguez, Rev. Daniel	New York City Clergy for Justice Association	Oral
Rojas, Ricardo	UPROSE, Environmental Justice Community Organizer; Communities United for Responsible Energy (CURE)	Oral
Roland, Fogel, Koblenz & Petroccione, LLP	Empire State Petroleum Association, Inc.	Written
Roll, Doug	A.E.S. New York	Oral
Rooney, Kevin	Oil Heat Institute of Long Island, Inc.	Written/Oral
Rosenberg, Leah	Individual	Oral
Rosenblum, Daniel W.	Pace Law School Pace Energy Project	Written
Saillant, Dr. Roger	Plug Power, Incorporated	Written/Oral
Salo, Tom	Individual	Written
Schell, Dr. Lori Smith	Independent Power Producers of New York, Inc. (IPPNY); Trigen Energy Corporation	Oral
Schibli, Alex	Individual	Oral
Schneiderman, Eric T.	New York State Senator - 30th District	Written
Seebachan, Barry S.	Bronx Shepherds Restoration Corporation; Association for Energy Affordability; Policy Advisory Council to the New York Weatherization Program	Written/Oral
Seidler, Irmgard	Individual	Written
Serotoff, Mark	Sustainable Energy Alliance of Long Island - Townline Association	Written/Oral
Seyfried, Curtis	New York State Sustainable Energy Coalition (NYS-SEC), Communities United for Responsible Energy (C.U.R.E.), We Stay / Nos Quedamos Committee, Inc., Community Advocate	Written/Oral
Shapiro, Howard	Energy Association of New York State	Written/Oral
Shapiro, Susan/Ritter, Maureen	Rockland Close Indian Point, Rockland Citizens' Awareness Network	Written
Simpson, Walter	Western New York Sustainable Energy Association (WNYSEA); SUNY Buffalo	Written/Oral
Sinclair, Jim	El Paso Corporation	Written/Oral
Sinton, Chris	Alfred University	Oral
Slatkin, Marcia	Individual	Written
Smith, Jeffrey K.	New York State Electric & Gas Corporation	Written
Smith, Robert A.	Individual	Written/Oral
Smyth, Elizabeth Cunningham	Individual	Written
Sontag, Charles	Individual	Oral
Soos, Paula	Convanta Energy Corporation	Written
Stebbins, Todd	New York Public Interest Group, Inc. (NYPIRG)	Oral
Stetzer, Susan	East River Environmental Coalition; Communities United for	Written/Oral

Name	Organization	Comments
	Responsible Energy (CURE)	
Stouffer, John	Sierra Club, Atlantic Chapter	Written
Stout, David	Individual	Oral
Sturm, Lois M.	Individual	Written/Oral
Super, Reed W.	Riverkeeper, Inc.	Written/Oral
Sussman, Edna	Federated Conservationists of Westchester County, Inc.; Environmental Advocates	Written/Oral
Swartley, Kevin	New York Corn Growers Association (NYCGA)	Written/Oral
Sweet, Alan	Chenango North Energy Awareness Group (CNEAG)	Oral
Teetz, Robert D.	KeySpan Corp.	Written
Teneyck, Michelle	Individual, Citizens Awareness Network	Oral
Tevelin, Ben	Individual	Oral
Thomas, Wayne	CDR Management Corporation, Subdivision of Asset Management Division of Bedford Stuyvesant Restoration Corporation	Oral
Tonko, Paul D.	105th Assembly District, Assemblyman	Written
Trabold, Christopher	Independent Power Producers of New York, Inc. (IPPNY)	Written/Oral
Trikha, Ashok K.	Individual	Written
Tripp, James T. B.	Environmental Defense	Written/Oral
Trisko, Eugene M.	Center for Energy and Economic Development, Inc. (CEED)	Written
Tyner, Joel	Individual	Written
Vercolen, Michael	Green Party, Broome County	Written/Oral
Victor, Shirley M.	Individual	Written
Vitek, Bill	Clarkson University Center for Environmental Management	Written/Oral
Wahl, Gerald F.	Harbec Plastics, Inc.	Written/Oral
Warren, Barbara	Consumers Union	Written/Oral
Wells, Barbara	Individual	Written
Wentlent, Christopher	A.E.S. New York	Written/Oral
Wertman, Sheldon	Atlas Copco Air Compressors	Oral
White, Donald R.	Individual	Written
Whitley, Kathleen	Sustainable Energy Alliance of Long Island	Written/Oral
Wilder, Ian	Babylon Greens, Town of Babylon	Oral
Wilkens, Paul C.	Rochester Gas and Electric Corporation, R.G.S. Energy Group	Written/Oral
William Day	University of Binghamton	Oral
Williams, Jeffrey	Niagara Mohawk, A National Grid Company	Oral
Winkelman, Steve	Center for Clean Air Policy; Transportation Working Group for Governor Pataki's Greenhouse Gas Task Force	Oral
Wood, Robert	Clarkson University	Oral
Wooley, David	American Wind Energy Association (AWEA)	Written/Oral
Wooster, Margaret	Great Lakes United	Written/Oral
Wright, Jonathan	Green Party	Oral
Wright, Senator James	New York Senate Energy and Telecommunications Committee	Written/Oral
Yahm, Elinor	Individual	Written
Yehle, Raymond A.	NYS Weatherization Directors Assoc.; P.E.A.C.E., Inc.	Written/Oral
Young, Margaret Hays	Sierra Club, New York City; Sierra Club, New York State	Written/Oral
Zacharia, Mary Ann	American Lung Association of Nassau-Suffolk	Oral
Zadlis, Peter	Individual	Written
Zeltmann, Eugene W.	New York Power Authority	Written/Oral
Zerbian, Tina	Cattaraugus Community Action, Inc.	Written
	Association of Energy Engineers, New York Chapter	Written
	Consumers Union, Consumer Policy Institute	Written

Name	Organization	Comments
	EnergyPlus Cooperative of the Southern Tier and Finger Lakes	Written
	New York State Tug Hill Commission	Written
	Niagara Mohawk, A National Grid Company	Written
	NY Renewable Energy Coalition	Written
	Tomkins County Environmental Management Council Energy Committee	Written