



New York State Rural Electric
Cooperative Association, Inc.



Delaware County Electric Co-op
Oneida-Madison Electric Co-op
Otsego Electric Co-op
Steuben Rural Electric Co-op

P.O. Box 128, Hartwick, NY 13348

(607) 293-6622 Fax: (607) 293-6624

NYSRECA Comments to Draft Scope for the 2013 New York State Energy Plan

NYSRECA commends the Energy Planning Board on the Draft Scope for the 2013 New York State Energy Plan. We strongly believe that any energy plan needs to consider a wide variety of socio, economic and political issues which the draft scope addresses. Further, it is essential that an energy plan consider *all energy sources* in the State and that the State energy policy addresses all sources of energy consumed and that the inter-dependency of sources, and inter-relations between industries, be given serious consideration in the plan development.

The following comments are provided to specific sections of the document:

Section I

NYSRECA recommends that the scope outlined in the Overview be done vis-à-vis with reference to the State's energy goals. It is further recommended that goals (including mandates) be explicitly stated to the degree possible so that a plan can be developed addressing specific objectives.

Section II

Energy Efficiency: As stated above, NYSRECA believes that it is imperative that any energy efficiency planning be done from the perspective of the most basic energy metric—i.e. switching from heating a building with oil fuel to electricity—and considers the source of electricity and its aggregate sources of supply.

Renewable Resources: NYSRECA strongly encourages the Energy Plan consider whether current practices under the RPS auction are achieving State objectives for renewable energy penetration in the state. Further, NYSRECA recommends that the Plan assess the extent of environmental attributes that are, or could be, generated within the State that could contribute to the State's energy goals that are not either eligible to participate in the RPS auctions or were/would not be selected due to funding limitations. NYSRECA further recommends the Plan assess the extent of renewable resources that have been proposed for development but have not been successful due to local community opposition. It would also be interesting for a plan to assess the economics of various renewable resources to identify challenges and obstacles such projects have even if selected through an RPS auction.

Section IV

Natural Gas: NYSRECA suggests that consideration be given to limitations and restrictions that exist today in the use of natural gas throughout the State specifically as it relates to the lack of gas transmission and distribution infrastructure in many areas of the

State. If not addressed, this limitation will restrict much of the State geography from reducing its dependence of liquid petroleum products (e.g. oil, propane) which can be transported by rail and truck further exasperating energy consumption and emissions.

Coal: NYSRECA suggests that the referenced forecasts include consideration to projecting the impact of existing and new regulations being considered by the U.S. EPA relating to fossil-fuel power plants. Specifically, NYSRECA recommends the Plan consider the extent of plant closures, impact on the NYISO wholesale supply, transmission congestion, regional electricity prices, substitute generation sources (including environmental and fuel sources) and other considerations that could be effected by a possible major reduction in a substantial electricity source to the State.

Section VI

Climate Change: NYSRECA suggests that the proposed policies consider impacts on the NYISO wholesale supply, transmission congestion, regional electricity prices, substitute generation sources (including environmental and fuel sources) and other considerations that could be effected by a possible major reduction in a substantial electricity source to the State.

Section VIII

Health: NYSRECA suggests that consideration not only be given to how “emerging technologies and fuels” impact public health but also to how future energy goals, policies and regulations may adversely impact public health from the perspective of pricing, accessibility, affordability and other considerations across all social and economic segments in the State.

Environmental Justice: NYSRECA suggests that full consideration be given to the balance associated with achieving State energy goals and objectives against the well-being of the environment. This should include consideration to the effects on public health associated with the economic cost to consumers and tax-payers required to achieve State energy policy objectives.

Section IX

Local, Regional, and Federal Action and Collaboration: NYSRECA advises that the Plan assess the extent of failed renewable energy projects in the State due to local home-rule opposition. It is NYSRECA’s experience that the local but vocal minority groups can form local opposition (i.e. “NYMBY”) that can significantly influence local and regional governments to adopt regulations that preclude the development and siting of energy resources that are supportive and consistent with State energy policy. This effect has occurred to the point where developers have avoided the State to focus resources and efforts on projects proposed in other regions of the country with less local opposition.

NYSRECA recommends that the Plan consider this potential obstacle in how best to encourage local and regional collaboration in achieving energy objectives.