

To the State Energy Planning Board,

The 2013 NYS Energy Plan should be focused on decreasing costs to the State and Ratepayer.

"State Energy Planning Board will conduct the planning process, which will culminate in recommendations that, when implemented, will keep New York at the forefront among the states in providing its residents with reliable, economical, and clean energy resources."

As to:

1. Reliable

a. Since ratepayer delivery fees are applied to the transportation of energy to one's home or business, the required upgrades for the transmission of this energy should be taken from this fund. Any upgrades required for access to the grid should be paid for by the business accessing it. The NYS Energy Plan should examine how effective this system is and how the delivery fees are utilized. Intermittent sources of energy should pay for special required upgrades.

b. Reports of generation and upgrades should be readily available and timely. Reports should be easily understandable. No source of energy should be exempt, as some renewables are. Intermittent energy sources' impact on the grid should be also readily available and timely. Loss of energy due to the distance the energy traveled should be quantified; i.e. If Windpower from western NY is traveling to NYC, what is the actual amount that arrives? What is lost due to distance? Bottlenecks? Especially since ratepayers are charged a Revenue Decoupling Mechanism Fee.

c. Reliability should be also based on storage of energy and access to the stored energy. The reports on the efficiency of the Renewable technologies should be readily available and easily understandable to the ratepayer since this also effects the Revenue Decoupling Mechanism Fee.

2. Economical

a. Control of Ratepayer Fees

(1) NYS Assessment Fee- A NYS General Fund fee should never be tied to energy usage. It conflicts with the mission/goals of the PSC and FERC and is not uniformly applied.

(2) RPS/SBC Some ratepayer bills state it is a State mandated charge. While the goal may be admirable, these fees are not equally applied. NYPA, LIPA and NYC do not have these state mandated fees. Is it truly a state mandated charge that is being arbitrarily applied?

(3) RGGI should never be used to balance the General Fund. Also the usage of funds to implement the RGGI in NYS was 30% and the highest of all participating states. The Energy Plan should control the costs and consolidate its implementation.

http://www.rggi.org/docs/Investment_of_RGGI_Allowance_Proceeds.pdf page 49 and 50

(4) Solicitation of Renewable blocks -When advertising to buy blocks of Renewable Energy it should be clearly stated to the ratepayer that they are not necessarily buying green energy BUT THE FUTURE BUILDING of green energy facilities that may generate credits for other states.

(5) Since there is a NYS Platform for Greening of NY, then all generation of Renewables should go to this STATE FIRST and not be sold to other states. Why should we live with the negative carbon footprint and not benefit from all of it?!

(6) Longevity as well as efficiency should rank the renewable resources. Since Western NY has nearly 20% hydro, has it not met its quota? Other areas should step up and share the responsibility.

(7) Cost effectiveness of an energy should not include any subsidies in the calculation.

(8) When calculating energy source output, the units of measure should be consistent. An overt example of what not to do is output of wind in terms of "houses". This is not a measure of electricity. Why do this except to camouflage reality?

3. Clean energy resources

It is time to consolidate our government. Give subsidies only for successful performance and take back subsidies from those who have not met the requirements. The IDA's that support these endeavors should be required to monitor the compliance of PILOTS and have clawbacks.

Lobbying groups and government should have to maintain distances. The people of NYS should have more input.

Thank you.

Respectfully,

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