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UTC Power

A United Technologies Company

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APR 29 2011

NYSERDA

To: NYSERDA

Date: April 30, 2011

Re: 2013 New York State Energy Plan Draft Scope

UTC Power Corporation (UTCP), a United Technologies company, values the opportunity to provide comments for the 2013 New York State Energy Plan Draft Scope. We are encouraged to see this effort toward a unified energy policy in New York, across both public and private sectors. The implementation of the ultimate energy plan is critical to putting the State in a position of economic, technical and environmental leadership.

United Technologies Corporation has over 3,800 employees across New York State and has spent over 1.5 billion on supplies and taxes in the State. UTCP is a successful supplier of fuel cell technology and continues to make progress in combined heat and power (CHP) technologies. We have provided comments on the Sections below and will continue to assist with your mission in exploring different technologies and sources of renewable energy.

Section II. *Meeting the State's Energy Needs and Goals with Energy Efficiency and Renewable Resources*

UTCP supports the consideration of the potential impacts of distributed generation and CHP systems. CHP fuel cell technology significantly reduces transmission loss, and heat loss, and in addition, has ultra-low emissions. Furthermore, the systems generate electricity and thermal energy at the point of use, increasing energy efficiency.

Section IV. *Meeting the State's Energy Needs and Goals by Fuel Type*

UTCP is very pleased to see the inclusion of natural gas infrastructure for meeting the state's energy needs. The expansion of the use of natural gas for building heat, and in the transportation sector paves the way for increased energy savings and improved reliability.

Under the sub-section "Other and Alternative Energy Sources," UTCP would like to suggest the inclusion of fuel cells. Fuel cell technology has proven to be a reliable and a vastly efficient alternative energy source, and New York has been a leading early adopter of commercial fuel cells.

Section V. *Growing New York's Clean Energy Economy*

UTCP acknowledges how important it is to sustain economic development in clean energy, and provide tools to enhance workforce and educational programs. By investing in CHP fuel cell technology and providing economic incentives, there are many steps to the process that provide opportunities for employment. These steps include the manufacturing, distribution, installation, and servicing and repair of such CHP technology. UTCP understands the nature of competition and believes that the utilization of CHP products can create this desired competition in renewable energy markets within the state of New York.

Section VI. Climate Change and Environmental Impacts

UTCP appreciates the efforts in increasing the use of low carbon energy resources and measures that result in carbon mitigation. By evaluating greenhouse emissions such as SO₂ and NO_x, improved air and water quality can be recognized. With economic incentives in CHP technology, UTCP believes these goals are attainable.

Section VII. Investing in Resilient Energy Infrastructure, an Efficient Transportation System, and Smart Growth

Resilient Energy Infrastructure: It is important that the plan emphasizes reliability and resiliency. When considering renewable energy, UTCP knows the importance in investing in alternative energy that is reliable and sustainable. CHP fuel cell technology exemplifies 24/7 reliability with the ability to maintain continuous electricity and heat to a site in the event of a grid outage.

Transportation: While increased electrification of transportation would move New York State closer to achieving high-energy performance, the plan may also want to consider other alternative fuels for transportation such as hydrogen infrastructure and other technology. By including a diverse range of alternative fuel sources in the scope, it allows for more opportunities to achieve energy efficiency and reliability, as well as facilitate economic growth and state employment.

Section VIII. Health and Environmental Justice

UTCP supports a scope that prioritizes the facilitation of a healthier environment through decreasing emissions. By investing in renewable energy and advanced technology such as CHP fuel cell systems, a healthier atmosphere can be provided for New York State residents because of its ultra-low emissions.

After reviewing this scope, we are in full support of the initiatives NYSERDA is striving to fulfill and UTCP would like to thank you for the opportunity to provide insight on the matter. We strongly recommend the inclusion of CHP and fuel cells in the finalized plan. CHP and fuel cell technology can making a meaningful impact and has the potential to enhance New York State's energy portfolio. Most importantly, we look forward to the implementation of a comprehensive energy plan that lays out clear steps for achieving New York's goals of a cleaner environment and stronger economy.

Sincerely,



Michael O. Brown
Vice President Government Affairs and General Counsel
UTC Power Corporation
A United Technologies Company