

NEW YORK STATE APOLLO ALLIANCE

Creating a New York State Carbon Reduction Baseline

The New York State Apollo Alliance (Apollo) welcomes the opportunity to comment on the Draft Work Scope for the 2009 New York State Energy Plan. We are the state affiliate of the National Apollo Alliance, a coalition of labor, business, community and environmental leaders working to develop good jobs in the emerging clean energy economy. *We support the development of state-level clean energy policies that will create thousands of high quality, family-supporting jobs while simultaneously curbing global warming pollution and enhancing energy security in New York and the Nation.* The Alliance also supports programs that target a significant percentage of the state's clean energy investments in pathways out of poverty programs, so that people with limited access to the fossil fuel-based economy are trained to participate in, and benefit from, the emerging clean energy economy.

Apollo supports the State Energy Planning Board and its assigned task of creating an Energy Plan for the State of New York, as outlined by Gov. David Paterson's Executive Order #2. A state energy plan is needed to confirm credible baseline projections of out-year energy needs. In an era when New York State is already investing hundreds of millions of ratepayer and taxpayer dollars annually in conservation and efficiency strategies, and in the development of renewable energy sources such as wind, solar and bio-fuels, anticipating future energy needs is critical to determining how much of the state's energy portfolio must continue to be generated by fossil fuels such as coal, oil and natural gas, as well as nuclear power. Accurate long-range forecasts of energy use will allow the State Energy Board to set and evaluate realistic greenhouse gas reduction goals, and to evaluate the effectiveness of programs such as the Renewable Energy Portfolio Standard (RPS), the Energy Efficiency Portfolio Standard (EEPS), and the Regional Greenhouse Gas Initiative (RGGI). The New York State Apollo Alliance supports a national carbon emissions reduction goal of 80 percent below 1990 levels by 2050, and urges New York State to increase its leadership role in achieving this goal.

Job-creation Focus

The investments that will be necessary to achieve meaningful carbon reduction goals will require significant support from the people who will be paying for these necessary programs. New York's ratepayers and taxpayers will support programs such as the EEPS, RPS and RGGI when it becomes clear that they represent an economic strategy that will lead to economic growth and job creation. Building support for these initiatives among those concerned about the environment and about the workforce can help create the political alliance necessary to achieve meaningful climate reduction and job creation goals. *Those who are active in the green jobs movement increasingly hear of concerns that the training of the clean energy workforce is lagging behind the actual imperatives of the state's ambitious programs.* Good new jobs are starting to be created in the renewable sector, and there is much work to be done to achieve efficiency goals. That's why training the clean energy workforce should be a priority and the state officials who are responsible for workforce planning should be involved now.

- The Apollo Alliance urges the addition of the Commissioner of the Department of Labor to the state Energy Planning Board and the active participation of DOL staff in the working group.

In addition, the Alliance, and allies such as the Workforce Development Institute, the United Steelworkers, New York State United Teachers and the Blue/Green Alliance (Sierra Club and United Steelworkers), understand that it will take a conscious and planned effort to train and develop the workforce necessary to carry out ambitious efficiency and renewable strategies. The DOL, along with union apprenticeship programs, community colleges and Boces programs, form the backbone of New York's workforce development infrastructure. It will not be possible to achieve the necessary carbon reduction goals, despite all the best intentions, without the active participation of this sector from the very beginning.

Contradictions Inherent in State Energy Planning

Because the Alliance approaches state energy planning from a carbon reduction perspective, we are concerned by the Draft Scope's statement of long-range policy objectives and strategies (*III. Draft Scope of the 2009 Energy Plan, (A) (a), pg. 1*), which states as its goal, "to increase energy supply and reduce energy demand." When questioned about this apparent contradiction, state Energy Board officials asserted that the increase in energy supply did not automatically mean an overall increase in state energy output, and that at least a percentage of the new supply would be replacement for existing older power generating sources with a larger carbon footprint. That's why it is important to be clear at the outset: if the reductions in greenhouse gas pollution from New York's power generating sector are not sufficient to achieve New York's ambitious efficiency and renewable goals -- EEPS: 15% reduction in anticipated energy use by 2015 / RPS: 25% renewable energy by 2013 -- then the planning board process will be unsuccessful. *The Energy Board must be clear that achieving reduction in energy demand through efficiency, and reductions in carbon emissions by increasing the use of renewables, is critical to the development and maintenance of system reliability.*

Putting Renewables and Efficiency First

Clarity on the reasons for the state's energy investments are critical to the success of its energy planning efforts. That's why priority, with the Energy Board's support, should go to investments in the emerging renewable industries, such as solar, wind and bio-fuels, and to efficiency. The Energy Board, working with the Governor's Renewable Energy Task Force, needs to aggressively identify what is needed to achieve the goal of generating 25 percent of the state's electricity using renewable energy resources by 2013, and should already be planning for ambitious 2nd stage renewable goals.

At the federal level, Apollo supports a massive commitment to rebuild the nation's infrastructure with clean and efficient energy technologies. *A building can be renovated in less than a year – a private home even quicker – providing jobs, and a quick economic stimulus while making a major dent in our nation's long-term energy bills and greenhouse gas emissions.* National Apollo supports the creation of a federal Energy Smart Fund to upgrade the energy efficiency of all buildings by 40 percent by 2025. The

state Apollo Alliance supports similar state-level investments that will reduce energy use, create jobs, stimulate the economy and improve the quality of life, especially for low-income New Yorkers who are most in need of weatherization, heating and cooling system upgrades, and other home improvements.

In addition, New York is already a national leader – along with California – in the development of healthy and high performance standards for school construction and renovation. These represent some of the largest investments made by state and local governments, and have direct impact on the lives of children, teachers and staff. New York City expects to invest around \$14 billion over the coming decade in building green schools (mandated by Local Law 86). A similar range of investments will take place in the rest of the state. Energy efficient schools can save local taxpayers money while providing students the quality daytime, indoor environments they deserve. The Energy Board should make an effort to engage the state Department of Education and its commissioner in its long-range planning efforts.

Advanced Coal Generation and Carbon Capture and Sequestration

While it is full speed ahead for renewables and efficiency, New York's primary fossil fuels – coal and natural gas – will continue to be a dominant part of the state's energy mix, along with nuclear power, for years to come. Apollo supports the development of integrated gasification combined cycle (IGCC) advanced coal generation technology. However, the Alliance would only support the use of IGCC if it is combined with the maximum achievable system of Carbon Capture and Sequestration (CCS). Because fossil fuels will remain a major portion of New York's energy mix for at least the next half century, Apollo believes that the development of CCS where geologically appropriate in the southwestern portions of the state, and elsewhere if possible, should be a priority of state energy planners. *Moving quickly to develop a commercial scale CCS system will provide the state with a large carbon emission reduction wedge.*

The high cost of developing such a system is a hurdle to be overcome, and will require significant federal assistance. In that regard, there is an important role for New York's two senators and its Congressional delegation to play representing the state in the development of federal energy policy. Because of the potential real world reductions in carbon emissions through the development of a CCS system, Apollo is open to the use of revenue generated through the sale of carbon emission credits under a cap and invest (trade) system.

Environmental Justice, Disproportionate Burdens on Communities and Pathways Out of Poverty

The draft scope references several aspects of environmental justice including the disparate impact of the hazards of electric generation (g)(m). *Low income communities and communities of color should not be subjected to disproportionate impacts from the siting of electric generating facilities.* Instead, money should be invested to revitalize such communities by making them models of energy efficiency and green building.

Using investments in the clean energy economy as a pathway out of poverty is a public policy initiative that has already been embraced by Congress, and should be emulated and advanced in New York State. The 2007 federal energy bill included a \$125 million workforce training initiative, of which \$25 million is to be made available specifically for Pathways investments. Congress intends for this to be an annual workforce investment for the next 10 years.

Other communities have begun exploring Pathways programs, including Oakland, California, where the Ella Baker Center, a community-based organization, is partnering with the city to create a green jobs corps that will train disadvantaged young people for work in the clean energy economy. A program funded by the City of Los Angeles to retrofit municipally owned buildings in a low-income community, brings building trades unions, employers and educators together in a pre-apprenticeship pathways program. There is tremendous potential for similar initiatives in New York.

High Road Strategies for Transportation Alternatives and Road and Bridges

The New York City Metropolitan Area already has the nation's most advanced system of public transportation (j). Across the state, rising gas prices are leading increasing numbers of New Yorkers to mass transit. *The interconnection between reducing vehicle miles traveled (VMTs), curbing motor vehicle pollution, job creation and smart growth development is clear.* Maintaining affordability and reliability, with needed expansion, should be a primary goal of the Metropolitan Transportation Authority. Elsewhere in the state, light rail, plug-in hybrid electric vehicle and bio-fuels infrastructure should be a priority. In every way, reducing VMTs should be a primary goal of state policy. As the urban core gets redeveloped under the Brownfield Opportunity Area program and other state planning initiatives and incentives, public transportation will guide development in outlying areas.

Thank you for your consideration. The New York State Apollo Alliance looks forward to working with the State Energy Board to develop clean energy policies and a green workforce that will meet the challenges and opportunities posed by the global climate crisis and the state's economic development imperatives.