

SEP Comments
NYSERDA
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October 13, 2009

Re: Comments on 2009 Draft Energy Plan

Much effort and thought has been put into the 2009 State Energy Plan, and I recognize that the issues are complex. My comments are partially reflective of a private property owner that had been potentially impacted by a recently proposed transmission project (200-mile, 400KV, 1200 MW DC line-NYRI).

Tier Electricity Costs

To discourage increased consumption and waste, electricity costs should be tiered for residential and commercial customers. The more electricity consumed, the higher the "per kw-hr" rate should be set. For example the first 12,000 kwh per year could be sold at \$.14 per kwh, the next 6,000 kwh could be sold at \$.21 per kwh, etc. This would minimize those who "waste" energy because it is relatively inexpensive.

And for those who argue that electricity rates are high, I respond by saying that I greatly appreciate the electricity benefits I receive at my residence for only \$5.00 per day. Light, heat, and electricity for general use is an asset to be treasured and not squandered.

Decouple Revenue from Sales

Revenue should be decoupled from the volume sale of electricity; otherwise there is a disincentive for promoting conservation. If New York State is serious about reducing energy usage, this action must be taken. An exponential growth model will not work to achieve the goals that must be met.

Generators Close to Demand and SmartGrowth of Industry

Generators need to be located close to demand. Also, industries with high energy needs should be encouraged to locate (or relocate) close to large generators. Why rely on long-distance transmission lines? They are expensive, unsightly, and result in energy losses. They are also more vulnerable with respect to security.

Local Governments and Impacted Property Owners Should be Notified Early and Allowed to be Active Parties to Proposed Projects

Local governments and potentially impacted property owners were the last to find out about the NYRI project. No notification letters were sent and if the verbiage in the paper was missed, the public hearings were missed. To this day, I wonder if I should be looking up the NYISO queue weekly for early notice of a project that will impact my property.

Transmission Study Needed

The draft energy plan indicates that the transmission system is “old” and needs replacement and improvement. My house is old, but that doesn’t mean it needs to be replaced. I have seen no public document that included a detailed evaluation of the status of the existing transmission system, investigated the potential for rewiring, or evaluated potential life and proposed replacement of system elements. Perhaps the STARS report will include such data.

Transmission Needed Irrespective of Reliability or Economic Benefits????

I disagree with the statement below. Solar PV is local and has efficiency rates comparable to upstate wind. Solar PV also matches load patterns better. To date, I have seen no clear economic analysis between the two sources of renewable energy.

The State’s clean energy policy goals, which will increase the contribution of renewable resources in meeting electricity requirements, may also require construction of new infrastructure, irrespective of near term reliability or economic benefits.

Article X needs Reauthorization

Article X and Article VII need to be active at the same time. Being able to fast-track transmission lines (Article VII) but not generators (Article X) sets up an unbalanced process for location of new facilities. If generators can be located near the demand, transmission lines may not be needed.

Inventory of Right-of-Way Corridors

A right-of-way corridor inventory is needed; however, details need to be incorporated as to the suitability of different corridors. The Thruway corridor is different than a rarely-used railroad corridor that winds through rural villages. If corridors are to be mapped and identified as to use for future construction of utilities then that information needs to be freely available so that potential property owners can decide whether they want to purchase property next to a known “transportation” corridor. If I had known that the railroad property that abuts my property would be identified for a transmission line of 130’ towers spaced evenly out through the beautiful Sauquoit valley, I would not have moved here and spent the last 20 years trying to improve my property.

Indian Point-Identify Alternatives to Closure

More consideration needs to be considered before supporting the closure of Indian Point. Exactly what is going to replace the base load power that is generated, and what would be the environmental and social impacts to alternatives? Details are needed, not generalities.

Thank you for considering my comments.

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