

Thomas Congdon
Executive Director
Energy Coordinating Working Group
c/o NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

September 8, 2009

RE: 2009 New York State Energy Plan (August) comments

Dear Mr. Congdon:

We appreciate the efforts of the New York State Energy Planning Board and the Energy Coordinating Working Group in regard to trying to bring about an energy plan that truly benefits **ALL** NYS citizens, taxpayers and ratepayers.

The attached commentary (and the referenced 25 page **Citizens Questions** document) is a compilation of inputs from a wide coalition of not-for-profit environmentally concerned community organizations representing tens of thousands of citizens of New York State. The names of these groups are listed on page 23 of the referenced document. A small cross-section sample of the individual citizens who also support this document appear on page 22.

The bottom line is that the Renewable Portfolio Standard (RPS) has been (and will continue to be), an unmitigated technical, economic and environmental failure — which is borne out by an objective reading of the recent *Summit Blue* and *KEMA* reports done for NYSERDA.

As such we request that the New York State Energy Planning Board and the Energy Coordinating Working Group both take a formal public position that a one year moratorium on the NYS RPS is necessary.

Such a moratorium will give NYS the time to do a **comprehensive, objective, and scientifically sound** assessment as to which options will result in meaningful solutions to the significant energy and environmental issues facing the citizens of NYS — and to then come up with an Energy Plan that truly benefits all its citizens.

Sincerely,

— *John Droz, jr.*

Spokesperson; Physicist and Environmental Activist
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Citizen Comments on the 2009 NYS Energy Plan

Any NYS Energy Plan should first and foremost be a strategy that ensures that NYS citizens have **reliable, inexpensive** electrical energy, while **preserving the environmental assets of our state**.

Despite giving lip-service to some of these factors, the unfortunate fact is that none of these concerns are genuinely manifested in the NYS Energy Plan — which has become a political proclamation to appease and pander to select politically-favored organizations, businesses and individuals.

Indeed, the entire operation of setting up and then reviewing NYS energy “policies” is an exercise in media manipulation. There is no *bona fide* attempt to minimize bias by rooting out those with a financial or political stake in the outcome. This is antithetical to informed environmentalism, *and* to fruitful epistemological inquiry.

The key part of this Energy Plan is the **Renewable Portfolio Standard** (RPS), so our remarks will focus primarily on that element. The RPS has been an utter failure and a complete waste of possibly as much as two billion dollars of NYS taxpayer and ratepayer monies. (The exact amount is unknown, as the state has never fully itemized all the ancillary costs of this spendthrift program.)

The most significant difference between a *Science-based* Plan and a *Politically-based* Plan is the **assumptions**. These assumptions are the underpinnings for everything subsequently built on the Plan. Needless to say, if the foundation is sand, then even the most elaborate structure erected will subsequently collapse.

In a science-based plan, all assumptions are subjected to what is called **scientific methodology**. This is a historically time-tested guaranteed way to independently assess the legitimacy of proposed assumptions, BEFORE time effort, and money are wasted on construction that may be assured to fail.

In a *politically-based* scheme (like the NYS Energy Plan), no such effort has been exerted, as politicians, lobbyists and other agenda promoters simply go forward with whatever fanciful ideas are the most self-serving. Since it’s all being funded by the unlimited resources of NYS citizens, who cares? This cavalier attitude is typical of how NYS has been run, which is why NYS is nearly at the bottom of all states regarding almost every single economic cost-of-living category.

A good example of this greenwash groupthink is the **significant** assumption that: “*renewable*” energies are beneficial for NYS citizens, taxpayers and ratepayers. Not only does no independent scientific evidence exist that this is so, but **no such proof has even been asked for!** The unfortunate fact is that “renewable” energies *per se* are NOT necessarily beneficial for NYS citizens, taxpayers and ratepayers — so all efforts and monies invested promoting this fantasy are constructed on sand, and are essentially wasted.

The first reason for this is that the term “renewable” energies is not a well-defined technical term. Instead it is a political categorization. What makes an energy source “renewable” is open to debate. For example, there is scientific basis for contending that nuclear power is just as renewable — if not more so — than is wind energy. Yet nowhere in the NYS Energy Plan is this objectively discussed and resolved. The term “renewable” is just bestowed on politically favored energy sources. **That is NOT a science-based procedure.**

The second fundamental reason why “renewable” energies *per se* are NOT necessarily beneficial for NYS citizens, taxpayers and ratepayers, is that “renewable energies” are **not a homogeneous group** of similar energy sources. The fact is that they are profoundly different from one another (e.g. biomass *vs* wind energy *vs* geothermal). Any Plan that treats these as if they are inherently similar is an arbitrary **political manifesto** that is ignoring **technical realities**.

The third important reason why “renewable” energies *per se* are NOT necessarily beneficial for NYS citizens, taxpayers and ratepayers, is that **there is no independent scientific proof that they all are beneficial**. In fact essentially all independent evidence has come to the opposite conclusion: that the primary renewables (e.g. wind energy) are very expensive, unreliable, non-dispatchable, problematic to the grid, and environmentally destructive.

And why we are encumbering ourselves with all these liabilities? Oh yes, the “promise” that wind energy will materially reduce CO2 emissions, and thereby reduce Global Warming. Well if that’s the key reward, NYS would have certainly have had an independent scientific assessment done to determine exactly how much CO2 we would be saving, and at what cost, right? **Wrong.** *No such independent scientific assessment has ever been done for NYS!*

How can this possibly be? Very simple: **this is how political plans go — on and on, one half-baked assumption built on another, each expenditure subsequently exceeding the prior, all greedily driven by self-indulgent interests carnivorously feeding on NYS taxpayers and ratepayers.**

And what happens when a key element of the plan is proven to be inaccurate? *Scrap the plan you say? Start over you say?* Not a chance! When these agendaists have their teeth into us, they aren’t about to let go due to something as lightweight as factual evidence that they are wrong. No, **when such material arises, they simply morph the plan into a different beast.**

That’s exactly what the lobbyists have done here. What started out as a strategy to significantly reduce Global Warming, has changed into a “Plan for Economic Development.” *Why has there been such a transformation?*

For one reason, polls have shown that citizens’ concern for Global Warming has diminished significantly. Pollsters have concluded that the populous has become hype-saturated. A second explanation is that independent scientific analyses have now shown that the benefits of wind energy for reducing Global Warming emissions are not only **very small**, but **very expensive**.

Faced with these realities, the state and their political allies should have long since scrapped the RPS program — but no, they instead fabricated a new reason (“*economic development*”) to justify it. Rest assured that the phrase “economic development” wasn’t randomly selected, but was a carefully chosen marketing message based on what was a higher concern of today’s citizens.

Despite this fancy footwork, the underlying fact remains that the NYS RPS program has been — and will continue to be — a colossal waste of time and money. A group of independent NYS citizens has been directly dealing with NYSERDA for several **years** now. One of the key questions to NYSERDA has been to show the proof as to how much CO2 has been saved with this program.

As of this moment, that agency has yet to provide that **significant** information. This is not really a surprise, based on the recent studies commissioned by NYSERDA — that were designed to be a *justification* of the NYS RPS Program.

The results from two consultants (KEMA and Summit Blue), were very damning. This is particularly embarrassing to NYSERDA, as they did their best to hire consultants who were strongly pro-renewable energy — thereby hoping to insure a positive outcome (i.e. glowing praise for the NYS RPS). This is typical for how energy matters are handled in NYS: *above all else, make sure that the political agenda is moved forward.*

On the surface, the two consultant reports showed that there were supposed financial benefits to NYS as a result of the RPS program. However, like most of the NYS Energy Plan, the reports were a superficial assessment of what was going on. **A careful reading, by any objective and competent third party, would show that the RPS program is a colossal failure.**

As further proof of that, please see the full list of energy questions for NYSERDA, prepared by NYS citizens (<<<http://tinyurl.com/kkkuqz>>>). Many of these 60± questions have been asked repeatedly, in person, of NYSERDA. To date, and despite numerous promises, we have not received an acceptable answer on **any** of these. **The fact that these many legitimate questions still exist some five (5) years into the RPS program, is further indisputable evidence that this program is a charade.**

In section B of the *Citizens’ Questions’* document, it briefly explains the KEMA and Summit Blue conclusions, and how they are unmistakable evidence that these independent consultants have provided documentation that the NYS RPS program is an enormous waste of time and money. Because that information can be found in that reference, it won’t be repeated here.

In conclusion, we fully agree that NYS has some serious energy and environmental issues. However, we do **not** accept what is currently happening: *that the resolution of these critical matters is being determined and controlled by lobbyists and those with self-serving agendas.*

What we expect our elected and appointed **representatives** to do, is to make scientifically sound choices that are in the best interest of ALL NYS citizens!

That would mean that they would insist on independent scientific evidence that new electrical sources:

- 1) perform as well as the conventional choices available to us,
- 2) be cost-effective compared to conventional sources, and
- 3) have a material net benefit on the environment.

*No such assessment has ever been done of the NYS RPS program. Accordingly we insist that you recommend that the current RPS program be given at least a one year moratorium, and to then use that time to come with something that is **provably** meaningful and beneficial.*

If that attitude had been prevalent when the RPS idea was first brought forward, we might actually have accomplished something by 2009. Instead we have wasted at least five years of our time and money, and have done little more than enrich multinational conglomerates — at the expense of NYS citizens.

Renewables in general (and wind energy in particular) have been employed only because ignorance and avarice have joined forces.

Any objective assessment would determine that there are numerous unsupported and contradictory conclusions made in the “Recommendations.” Please delete all such items. [If an open-minded knowledgeable person would like to contact me, I’d be glad to identify some of the most troublesome matters.]

I have extensively traveled to all fifty states. The primary reason I live in New York State is that it has **extraordinary** natural resources. As such, they deserve special care and leadership. Such leadership would not trash the state's heritage and unparalleled natural assets for unsecured promises of short-term revenue.

Towards that end, please stop this charade of a blanket endorsement of “renewable” energies, and the politicalization of what should be a conservative scientific assessment.

Sincerely,

— *John Droz, jr.*

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Postscript Regarding the 2009 NYS Energy Plan

Maybe an analogy is appropriate to even more accurately convey the situation with the primary promoted “renewable” source: wind energy. Let’s start with a quote from wordsmith and energy expert Dr. Jon Boone.

“The overt politicalization of our energy policies on behalf of quasi religious and select economic interests is not only very alarming, but is a huge step backward to the realm of colonial days. Renewable energies once had a 100% market share — *and it corresponded with mankind’s energy poverty era.*”

“Wind technology is ancient stuff. It was largely discarded in the early nineteenth century because it is incompatible with the precision power machinery enabling modernity. Its variable, non-dispatchable flutter is inimical to the steady high-level performance characteristic of contemporary power systems. Today’s grids can ‘integrate’ anything, including wind and horse ‘power,’ if their political bosses so decree.”

The RPS electrical energy mandate makes no more sense than would a dictate that we convert 25% of our modern transportation to horse drawn vehicles. To be consistent, “green” advocates should be zealously embracing such a regression, because getting so many gasoline vehicles off the road would actually result in **significant** CO2 savings (much more so than with the electrical RPS).

But, just like with wind energy, there would be an environmental penalty. Tens of thousands of horses would be defecating and urinating on roadways, effectively turning them into open sewers. So we would be getting less CO2 – at the expense of more polluted waterways, and increased human health problems.

The good news is that thousands of new NYS jobs would be created in the manufacture, service and accommodation of horse-drawn transportation. Additional thousands of jobs would develop *via* horse farming, veterinary, and numerous related services industries (barn construction, feed, supplies, etc.).

Could we adapt our modern highways to this new use? Of course, just as with the electrical grid, we can modify anything if enough money is thrown at it. So add more thousands of new jobs for constructing new traffic lanes, for new sanitation engineers to clean up the horse droppings each day, and on and on.

So there you have it: horse power technology would provide **superior CO2 reduction benefits**, as well as **exceptional economic development gains**. *What’s not to like?*

So exactly why doesn’t the NYS Energy Plan actively support this transition too?

You’ll have to ask the energy planning board members, but our guess is that they instinctively realize that such a change would be a foolish waste of money, as well as being a step backward instead of going forward.

*If only they had such insight regarding what amounts to almost the exact same horse’s patootie choice: **wind energy** !*