

CITIZENS CAMPAIGN

FOR THE ENVIRONMENT

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Empowering Communities, Advocating Solutions.

April 29, 2011

NYSERDA
17 Columbia Circle
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RE: Comments on Draft Scope of the 2013 NYS Energy Plan

To whom it may concern:

Citizens Campaign for the Environment (CCE) is an 80,000 member organization that empowers communities and advocates solutions to protect public health and the natural environment in New York State and Connecticut. CCE works actively at the local, state, and federal level to advance policies and actions that reduce greenhouse gas (GHG) emissions, maximize energy efficiency and conservation, and promote clean, renewable energy solutions. CCE appreciates the opportunity to provide comments on the Draft Scope for the 2013 New York State Energy Plan (NYSEP), and for the work of the NYS Energy Planning Board in developing the scope.

CCE appreciates that the scope considers energy efficiency and renewable resources as a strategy to meet the state's energy needs, as well as weighing climate change, environmental impacts, and public health when making energy choices. Smart growth development, public transportation, and clean energy innovation are also important sustainable energy solutions that are explored in the scope.

However, the scope fails to provide a framework to adequately balance all factors when analyzing different energy sources. A full "cradle to grave" analysis, which considers the full life cycle of environmental, public health, and societal costs and benefits of our energy options is necessary to provide an accurate comparison of various energy choices.

CCE offers the following comments:

ENERGY EFFICIENCY

Efficiency and Conservation as a Priority. The cheapest, cleanest, and safest energy is the energy not used. First and foremost, energy efficiency and conservation are strategies that save ratepayer's money, reduce reducing pollution, and benefit the environment. *CCE strongly supports aggressive energy efficiency and conservation measures and recommends that efficiency and conservation are identified as first priority strategies used to meet New York State's energy needs and goals.*

Public Participation. In order to maximize energy efficiency and conservation for the people of NYS, the NYSEP should delineate meaningful opportunities for NYS to actively promote public participation in energy efficiency and conservation endeavors. *CCE strongly recommends that the NYSEP include meaningful opportunities for strong public participation and involvement to allow the public to be part of the solution, and also benefits from reduced costs as ratepayers.*

New York's 15x15 initiative and beyond. CCE strongly supports the state's 15x15 initiative as an important and achievable short term goal for efficiency and conservation. *The NYSEP should identify barriers impeding the state's ability to achieve this goal, and develop strategies to overcome barriers and ensure the 15x15 goal is achieved. Additionally, CCE recommends the NYSEP develop energy efficiency and conservation strategies and goals that significantly expand upon the 15x15 initiative.*

RENEWABLE RESOURCES

Realizing NY's renewable energy potential is essential to fight climate change, increase energy independence, benefit local economies, create green jobs, and ensure a sustainable economy and environment for current and future generations. The NYS Energy Plan of 2009 states that it is technically and practically feasible to generate more than 75% of New York's electricity from hydro, solar, wind, and biomass by the year 2018. *CCE recommends that the NYSEP identify renewable energy sources, such as wind, solar, and geothermal, as the priority for new energy generation.*

Wind. NYS is a wind rich state, ranked 15th in the nation for wind energy potential. Wind is emission free and abundantly available. *CCE recommends that the NYSEP favor policies and actions that will accelerate reaching New York's full wind energy potential, both on-shore and offshore in the Ocean and Great Lakes.*

To help identify effective policies that will advance offshore wind development in the Ocean and Great Lakes, *CCE recommends that the Energy Planning Board identify and analyze policies enacted in other states to advance offshore wind development, such as New Jersey.*

In the final report, "Our Waters, Our Communities, Our Future," developed by the NY Ocean and Great Lakes Ecosystem Conservation Council, it is recommended that NY should take a proactive approach in the siting of offshore energy infrastructure. This would include identifying critical offshore habitats, as well as areas that may be degraded. This type of planning is critical to advance clean renewable energy development, while protecting important habitats. *CCE recommends that the NYS Energy Board actively work with the NY Ocean and Great Lakes Ecosystem Conservation Council to develop a Marine and Great Lakes Spatial Plan.*

Solar. New York State has more solar power potential than Germany, the world leader in installed solar capacity. Unfortunately, New York State only generates approximately .01% of its electricity from solar, putting us far behind neighboring states such as New Jersey. A robust solar program will bring numerous benefits to New York State residents, including, but not limited to: local grid congestion relief; long-term energy cost reduction; electricity price

stabilization; improved air quality. and energy security. NY's peak demand correlates well with solar output, meaning an investment in solar generation curbs summer electricity price spikes. ***CCE recommends that the NYSEP incorporate a minimum goal of 10,000 megawatts (MW) of installed solar photovoltaic capacity by 2030 with interim goals of 500 MW by 2015, 1,500 MW by 2020, and 5,000 MW by 2025.***

New York's Renewable Portfolio Standard (RPS) and beyond. CCE strongly supports the state's 30x15 goal for generation of renewable energy. ***CCE recommends that the NYSEP support achieving this short term goal, and develop strategies to significantly expand upon the goal long term.***

Additionally, ***proposals to transition from an RPS to a Low Carbon Portfolio Standard that includes dirty energy generation such as nuclear, coal, gas, or trash incineration, should be rejected in the NYSEP.*** The RPS was vetted in a rigorous public review process and should maintain its integrity in the NYSEP.

THE NYSEP SHOULD NOT PROMOTE DIRTY, DANGEROUS, AND UNSUSTAINABLE ENERGY STRATEGIES.

The NYSEP scope identifies new nuclear power and carbon capture and sequestration (CCS) as part of New York's energy future. CCE strongly opposes new nuclear power plants. CCE is incredibly concerned with unproven CCS technology. ***CCE believes that NYS can achieve its energy needs without new nuclear power plants, and should not rely on unproven CCS technology.*** A 2010 report developed by Synapse Energyⁱ indicates that the US can meet the nation's energy demand, while retiring all coal plants, building no new nuclear plants, and retiring over a quarter of the nation's nuclear reactors.

Expanding Nuclear Power generation is not a sustainable energy solution. No new nuclear power plant has been built and become operational in our country in decades. It is no wonder why, as high risk, exorbitant costs, and legacy waste come along with nuclear energy production. The legacy of toxic waste that persists from the use of nuclear energy threatens to contaminate our drinking water and land for tens of thousands of years. ***CCE recommends that the NYSEP does not include any new nuclear power plants as part of New York's energy future.***

The disaster at the Fukushima nuclear power plant in Japan reaffirmed the significant safety, environmental, public health, and economic risks associated with reliance upon nuclear energy. The earthquake and subsequent tsunami disabled the reactor cooling systems, leading to nuclear radiation leaks and triggering evacuation zones around the plant. The devastating adverse impacts of this tragedy will be felt for many years to come.

Closer to home, Western New York residents are struggling to secure a full cleanup of the West Valley nuclear waste site-- a nuclear reprocessing site--contaminated half a century ago. Radioactive waste from the site has been discovered migrating towards our precious Great Lakes.ⁱⁱ In addition, nuclear waste does not make our nation more energy independent, as the vast majority of uranium currently used for nuclear energy is imported from other countries, such as Russia. ***CCE strongly recommends that the NYSEP incorporate an evaluation of the risks***

and costs associated with the full life-cycle of nuclear power, including mining, refining, generation, and ultimate disposal.

Carbon Capture and Sequestration (CCS) is not a sustainable or proven solution.

It is irresponsible for the NYSEP to depend upon CCS as an energy solution. CCS is an unproven technology, continues our reliance on fossil fuels, and has led to serious environmental and public health risks. One of the world's largest CCS demonstration projects in Saskatchewan, Canada, is injecting approximately 8,000 tons of CO₂ into the ground every day. The Saskatchewan project led to significant adverse environmental and health impacts. Local farmers on the land above the CCS project have documented leaking gas that is believed to cause algal blooms, bubbling ponds, explosions, and killing of many small animals in the areaⁱⁱⁱ.

In addition, using CCS often means the continued use of carbon based fossil fuels, such as coal and natural gas. The goal should be to move away from fossil fuels as quickly as possible, not continue New York State's fossil fuel addiction. Even if CCS was eventually developed and became a "proven" technology, continued reliance upon fossil fuels has significant adverse impacts, including, but not limited to: mountain top removal for coal, hydraulic fracturing for shale gas extraction, coal ash waste, mercury pollution, and thermal water pollution from power plants. *CCE recommends that the NYSEP use effective, sustainable energy solutions; and not be dependent upon unproven, dangerous, and unsustainable CCS technology.*

NYS should not build new coal-fired power plants

The adverse public health and environmental impacts caused from coal fired power plants are well known, including, but not limited to: acid rain, mercury contamination, climate change pollution, and dirty and destructive mountain top removal for coal extraction. *CCE recommends that the NYSEP call for no new coal plants, and develop a strategy to phase out all existing coal plants as soon as possible.*

CLIMATE CHANGE AND ENVIRONMENTAL IMPACTS

CCE strongly supports the NYSEP considering climate change and environmental impacts when considering energy choices. However, the scope indicates that it will draw upon information and analysis from other New York State planning efforts, including the Interim Report for the NYS Climate Action Plan. Much of the analysis in the Interim Report is flawed, and has not incorporated public input. *CCE recommends that the Energy Planning Board consider the thousands of comments that were submitted on the Interim Report*, including CCE's comments attached for your consideration.

When considering the climate change impacts of potential energy choices, *CCE recommends that a thorough "cradle to grave" analysis of the carbon footprint. Examples include:*

- When analyzing the carbon footprint of nuclear power, the NYSEP should consider, at a minimum: construction; mining; refining; transporting ore and refined fuel; waste transportation and storage; and transportation associated with the operating and safety professionals involved in all phases of the nuclear power generation.

- When analyzing the carbon footprint of extracting natural gas from shale formations via hydraulic fracturing (“fracking”), the NYSEP should consider the entirety of GHG emissions during gas extraction, compression, transmission, and consumption. ^{iv}
- When analyzing the carbon footprint of coal, the NYSEP should consider, at a minimum: mountain top removal, mining, refining, transportation, combustion, and transportation of waste.

There are serious public health and environmental costs associated with the entire life cycle of fossil fuels and nuclear energy. Conversely, there are significant public health and environmental benefits associated with efficiency and renewable energy sources such as wind and solar. *CCE recommends that the NYSEP quantify these “unaccounted” costs and benefits in the policy analysis.* For example, the NYSEP should quantify and incorporate the costs and benefits of:

- Over 65% of New Yorkers live in counties where air pollution endangers lives, due largely to pollution from fossil fuel combustion.
- Annually, fossil fuel emissions cause 1,200 premature deaths and 25,000 heart attacks in NYS.
- Poor air quality triggers asthma attacks. Kids in the US miss 14 million days of school annually due to asthma—the leading cause of school absenteeism due chronic illness in the nation.
- Burning of coal in the United States has a hidden external cost of \$62 billion a year, primarily from health damages
- Emissions of sulfur dioxide and nitrogen oxide, primarily from fossil fuel combustion, contributed to more than 500 lakes in the Adirondacks being too acidic to sustain life.
- Nuclear reactors generate radioactive waste – 20 to 30 tons of high level nuclear waste per reactor. There is no federal repository for high level nuclear waste, leaving the problem of long term storage of these dangerous substances unsolved. Radioactive waste can threaten public health and our environment for tens of thousands of years.
- Cooling systems in fossil fuel and nuclear power plants in NYS kill 17 billion fish, fish eggs, and young hatched fish annually; kill another 171 million larger fish and other aquatic species annually; and withdraw nearly 16 billion gallons of water a day from the states lakes, rivers, and estuaries.
- Energy produced from wind and solar power produce no harmful emissions, and requires no water for cooling; benefiting public health, wildlife and our environment.

In conclusion, CCE believes the NYSEP can drive clean, sustainable energy practices and development that creates jobs, improves air quality, and protects water resources. A smart, clean and sustainable NYSEP will enhance New York State residents’ quality of life, energy reliability, while controlling volatile energy markets with aggressive energy efficiency and conservation measures. The NYSEP must dovetail with serious investments and cultivation of clean renewable energy technology while phasing out dirty and finite fossil and nuclear power generation of the last century. CCE is hopeful that the draft NYSEP will articulate the specific programs and policies, and establish meaningful milestones to realize a truly sustainable and clean energy future for our Empire State.

Thank you for your consideration of our comments.

Sincerely,

Brian Smith
Communications and Program Director

ⁱ Synapse Energy, *Beyond Business As Usual: Investigating a Future Without Coal and Nuclear Power*, May 2010
<http://www.synapse-energy.com/Downloads/SynapseReport.2010-05.CSI.Beyond-Business-as-Usual.10-002.pdf>

ⁱⁱ New York State Department of Environmental Conservation, *West Valley, History and Future*, 2008.

http://www.dec.ny.gov/docs/materials_minerals_pdf/westvalley2008.pdf

ⁱⁱⁱ Vancouver Sun, *Reported Weyburn carbon capture failure is bad news for the world*, January 2011,
<http://communities.canada.com/vancouver.sun/blogs/innovation/archive/2011/01/11/reported-veyburn-carbon-capture-project-failure-is-bad-news-for-the-world.aspx>

^{iv} Cornell University, Robert W. Howarth, **Methane and the Greenhouse-Gas Footprint of Natural Gas from Shale Formations**. 2011