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**Sierra Club Atlantic Chapter Response to the
New York State Energy Planning Board Public Solicitation of Comments for the
Draft Scope of the 2013 New York State Energy Plan**

The proposed “**Topic Areas to be developed in the 2013 State Energy Plan**” are organized as lists of topics, studies and reports and they are not organized as a Plan with overall objectives with a sense of design.

I. Overview of New York’s Energy Systems

Overview

- The evaluation of forecasted demand, system reliability, and supply options for all sectors must include modeling scenarios which incorporate health costs, air quality, green-house gases, the impacts onto water, jobs and economic prosperity for New York. Each of the scenarios must include carbon and the carbon equivalents for methane and nitrous oxide.

II. Meeting the State’s Energy Needs and Goals with Energy Efficiency and Renewable resources

Energy Efficiency

- Methodologies and metrics for the role of building codes must include the most comprehensive and efficient building standards such as Passive House.

Renewable Resources

- What exactly is the definition of renewable energy? Will the Renewable Portfolio Standard criteria for eligible renewable energy technologies serve as a template for all State programs?

- The concepts of baseload electricity generation and intermittent power will no longer be distinguished as electricity storage systems assure infrastructure security, how will the Plan address this transition?

III. Meeting the State's Energy Needs and Goals for Electricity

Electricity

- The impacts of increasing reliance on out-of-state generation must be studied and compared with in-state deployment of efficiency, conservation and renewable forms of energy. The creation of in-state jobs and economic revitalization must be assessed as well as the economic losses due to imports.

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

Natural Gas

- The State Energy Plan should assess the safety, negative economic, health, and environmental impacts of hydraulic fracturing as well as plan for a continuance of the moratorium on the process and possibly an indefinite ban.

Petroleum

- Contingency planning is required to rapidly conserve, to protect and prepare the public from the impacts of sudden oil supply constraints and large price hikes or catastrophes.

Coal

- Issues relating to existing coal-fired generation should include analysis of the impact of pending health and environmental rules and regulations onto New York's coal plants. Alternatives should include closing part of or the entirety of the coal fleet.

Nuclear

- The Indian Point nuclear facility could become our Fukushima disaster. The adjacent population density without a feasible evacuation plan, the safety exemptions, the potential seismic activities and the spent fuel pools require an immediate shut down. The Plan must support replacement power within the grid.

Other and Alternate Energy Sources

- The Plan must look at incorporating composting and recycling as a displacement of landfill and incineration. Landfill gas recovery and incineration are not forms of renewable energy.

V. Growing New York's Clean Energy Economy

Economic Development

- Barriers to energy efficiency and renewable energy must be identified.
- The Plan must examine the role of direct and indirect subsidies to all forms of energy production, and how these subsidies can promote or discourage the development of a sustainable energy future.

- Research regarding the option of public ownership of the electric grid as a public good and service must be examined to promote its optimization and a reduction in electric rates.

Clean Energy Innovation and Development

- Delayed procurement of solar and wind through power purchase agreements by the New York Power Authority and the Long Island Power Authority are preventing investments, what policy recommendations will address this problem?
- Various scenarios for Revenue Decoupling Mechanisms must be examined.
- Full cost electric rates for large industrial users should be considered as part of the comprehensive review of policies that affect the energy sector.
- Electric rates have been increasing despite the overall reduction of demand over the past few years. How do we assure that low income consumers benefit from what should have been a reduction of charges by the utilities?

Workforce Development and Educational Initiatives

- The public has been insufficiently informed on the recent developments in policy and legislation. A better informed consumer will greatly increase and enhance appropriate consumer participation for the implementation and development of sustainable energy.

VI. Climate Change and Environmental Impacts

Climate Change

- Methods to reverse atmospheric CO₂ levels from 390.4 to 350 ppm must be implemented as quickly as possible.
- A proposed measure such as implementing a moratorium and prohibiting any new CO₂ emissions from all sectors must be considered.
- A lifecycle analysis needs to be performed for all methods of energy production. This analysis must include mining, extraction, processing, transportation, storage, etc. Imports must also be included.

Environmental Impacts

- New York is not compliant with the National Ambient Air Quality Standards. The Plan must promote adequate measures to assure compliance as a matter of urgency.

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

Energy Infrastructure and Reliability

- Small decentralized renewable energy projects should be encouraged as an alternative to the expansion of unsustainable fossil fuel energy infrastructure including energy transmission corridors.

Transportation

- An expansion of rail and mass transit must be designed along with the contraction of aviation as a form of transportation.

- The Plan should take into account the increased development of regional and local agriculture to provide fresh quality food, lower food costs, reduce the use of transportation fuel, support food security, and spur local economic development.

Resiliency, Security, and Emergency Planning

-The Plan must address the amount and use of freshwater needed for the production of energy, such as biofuels, fuel extraction, and cooling systems. This brief must also examine scenarios for drought and flooding due to climate change onto the New York's energy system.

Smart Growth

- Urban sprawl issues and long-distance commuting must be addressed.

VIII. Health and Environmental Justice

Health

- Assessments of the health impacts associated with electricity production and energy use on public health and the environment should include the vulnerable communities within and outside of the State of New York.

- Respiratory diseases are an epidemic; a methodology must be created to assess cumulative health impacts when other polluting industries are present.

Environmental Justice

- Environmental Justice principles should be applied to all imports of electricity and fuels needed for the production of energy in New York, such as the electricity produced by hydroelectric dams within the Innu communities of Canada, the uranium ore extracted from the lands of the Navaho, and the coal mined in the low income communities of Appalachia.

IX. Local, Regional, and Federal Action and Collaboration

Local, Regional, and Federal Action and Collaboration

- The Plan must also identify barriers within the region and at the National level which do not support the development of a sustainable energy economy in New York.

Thank you for the consideration of these Comments.

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