

# The Hudson Renewable Energy Institute, Inc.

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Chairman and CEO

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State Energy Master Plan  
NYSERDA  
17 Columbia Circle  
Albany, New York 12203

## **Re: Comments on the Draft Scope of the 2013 New York State Energy Plan**

The Hudson Renewable Energy Institute (THREI) is a non-profit 501 (c) 3 educational corporation established to encourage the development and use of renewable energy through open market mechanisms.

Contained herein are comments from the Institute that hopefully will assist Plan developers in their scope of work.

First, under the heading of Renewable Resources the Plan Scope calls for a compendium of continuing actions impacting renewable resources. The compendium fails to mention the original intent in the establishment of the State Renewable Portfolio Standard, to wit: to have centralized procurement replaced by competitive market mechanisms. In appropriating almost \$3 billion from state jurisdiction customers from 2006 to 2024 consideration should be given to a sustainable renewable energy program that is supported by the competitive market place.

Second, the scope of the Plan is becoming too broad to provide a feasible road map for future State energy direction. Workforce development, educational initiatives, economic development, environmental impacts, transportation, smart growth, health, environmental justice, collaboration, all have a bearing on energy planning but do not in the Institute's opinion warrant section headlines and development. The focus should be on energy and the best ways to acquire and use energy to the overall benefit of the State's citizens

The Institute looks forward to the work of the Committee put in place to develop the 2013 Plan and the ultimate product of the planning process.

Sincerely,



Allan R. Page

