



Atlantic Chapter
353 Hamilton Street
Albany, NY 12210-1709

May 15, 2009

**Sierra Club Atlantic Chapter Response to
The New York State Energy Planning Board Public Solicitation of Comments for
the March 31, 2009 Energy Coordinating Working Group Interim Report,
2009 New York State Energy Plan**

The following comments are specific to the **Preliminary Findings**.

- **Pages 4-5, 4-12**
“...hydro - electric generation resources...hydropower...”
 - This technology should be referred to as hydroelectric dams or hydropower dams. Other forms of hydropower include run of the river, wave and tidal power.
- **Page 4-7**
“...trade-offs involved in the development of new baseload generation...”
 - As there will be an increase in installations of electricity storage systems and Smart Grid technologies, the concepts of baseline and intermittent power will be modified. The option of public ownership of the electric grid as a public good and service must be examined to promote it's optimization.
- **Page 4-13**
“...the Fitzpatrick Power Project...”
 - This project should also be described as a Nuclear Power Project.
- **Page 4-14**
 - 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.

- **Page 4-14, 4-15**
 - Environmental Justice principles should also be applied to all imports of electricity and fuels needed for the production of energy in New York State.
- **Page 4-17**
 - 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.
- **Page 4-18**
 - Contingency planning is required, to rapidly conserve fuel, to protect and prepare the public (with a focus on the vulnerable communities) from the impacts of sudden fuel supply constraints, large price hikes or catastrophes due to the climate crisis.

What exactly is the definition of “clean energy” and “renewable energy” in the Plan, and how do the standards for the Renewable Portfolio Standard (RPS), the Regional Greenhouse Gas Initiative (RGGI) or the Renewable Energy Task Force interact? Should the RPS criteria for eligible renewable energy technologies serve as a template for all State programs?

The Plan must include an Issue Brief addressing 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 scarcity, drought, and climate change impacts onto the New York watershed and water supply.

The **Interim Report** does convey a sense of direction for the State Energy Plan.

Thank you for the consideration of these Comments.



Annie Wilson

Energy Committee Chair
energy@newyork.sierraclub.org
1.212.388.9780