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The State Energy Plan should fully assess and examine in detail these items: 1. The desirability, strategies, urgency, and costs and benefits of an accelerated phase out of existing coal-fired power plants in New York within ten years or some other near term interval as part of a coherent and effective NYS climate action plan. The NYS Interim Climate Action Plan punted on coal. The State Energy Plan process can serve as a corrective. 2. Carbon capture and storage if it were applied to major existing coal plants in New York with special attention to these issues -- potential health risks, long term security of CO2 reservoirs, property right issues, liability assignment and costs, CCS energy/cost penalty.

Comment:

these issues -- potential health risks, long term security of CO2 reservoirs, property right issues, liability assignment and costs, CCS energy/cost penalty, likely amount of CCS actually achieved vs. what would be technically possible (i.e. will it be just 55% CCS as is envisioned by proposed NYS policy or 95% which is said to be technically possible), cost of power generation by CCS equipped power plants, and cost of CCS power compared with other cleaner, cheaper means of meeting electric demand, e.g. energy efficiency, wind, and solar. 3. The 350 ppm atmospheric concentration of CO2 threshold to avoid the worse consequences of climate change vs. the 450 ppm embodied in the NYS Interim Climate Action Plan. The State Energy Plan could also strive to be more of a plan than an energy narrative as in past years.