

Comment in PSC Case #15-E-0302, Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard.

I am commenting on the Department of Public Service proposed Clean Energy Standard because it is critical that we, in New York State, contribute all the strategies, technologies and work that we can to reduce fossil fuel and nuclear pollution while we rapidly transition to 100% non-polluting sustainable energy power generation. The provision that utilities and retail energy supply companies will be required to purchase a percentage of their power from renewable sources is good and has been done successfully in other states. However, the proposed Standard allows for too-long of a delay in bringing new renewables on-line. Now is the time for robust renewable growth with the Federal Investment Tax Credit. The proposed Standard wrongfully phases in new renewables at 2023.

New York State can, and should, lead by completing the New York State Climate and Community Protection Act which was passed in the Assembly on June 2, 2016:

http://assembly.state.ny.us/leg/?default_fld=&leg_video=&bn=A10342&term=2015&Memo=Y&Text=Y

It requires the state to reduce greenhouse gas emissions from major sources to zero by 2050. Yes! Yes, we want this! But, the proposed Clean Energy Standard is severely flawed in both what is included and in what is not included. The Public Service Commission should revise our state's goal to match the Assembly's act by mandating increases in power generation technologies that are sustainable and not heat-trapping gas producers. This is technologically feasible. The methods to achieve 100% renewably-sourced power for New York, and all of the other USA states, are at www.thesolutionsproject.org by Dr. Mark Z. Jacobson and colleagues. Our power should come from renewable energy projects within New York State, so that we keep New York's energy dollars within New York State. To make this Clean Energy Standard a viable, robust path toward a vibrant New York State, I ask the Public Service Commission to:

Set robust energy efficiency goals. It has long been known, and done in practice, that proper retrofitting of our existing building stock is the most affordable way to reduce heat-trapping gas emissions and displace fossil fuel and nuclear generators. This is required on a massive scale; utilities should be mandated to invest in energy efficiency retrofits for their customers in order to achieve aggressive demand-reduction goals. The Commission must advocate for an Energy Conservation Construction code for ALL buildings that is equivalent to or superior to the Passive House Standard.

The current efficiency programs lack accountability and do not significantly address the level of efficiency required to provide for safe and affordable energy retrofits. A new metric must be applied to the Green Jobs Green New York program. Quality of life must replace return on investment as the metric. Too often, those most in need of energy retrofits are told that they do not qualify for the program because the return on investment is too long, or that the savings to investment ratio is less than one. What is missing from consideration is the fact that a family will choose food over fuel if it has to choose. The Commission must change the economics and apply energy justice for all, not just those who are most privileged. Reduction in overall energy use without sacrificing quality of life should hold enough value to be achievable.

Mandate social justice and economic justice. Two bureaus of the New York State Office of the Attorney General should be helping the Commission frame the needs of Social Justice and Economic Justice, under which the Bureau of Environmental Protection exists. <http://www.ag.ny.gov/bureaus>

Enforcing a zero tolerance policy against any environmental threats in New York that imperil the air we breathe, the water we drink, and the land we live on, Attorney General Schneiderman is committed to ensuring that the Environmental Protection Bureau plays a central role in protecting New York's environment and public health.

Guarantee ratepayers' money is NOT used to subsidize nuclear power. Ratepayers deserve to have their money used efficiently and wisely. Ratepayers' money should NOT be used to subsidize nuclear power plants whose owners want shut because they are unprofitable. In the proposed Clean Energy Standard, the nuclear mandate wrongfully has no proposed cost cap. Customers would be required to pay whatever it takes to keep the nuclear plants in business, no matter how expensive that gets. And, utilities wrongfully would be required to purchase 4-14% of electricity from the failing nuclear plants. The cost of subsidizing unprofitable nuclear power could rise, wrongfully adding that cost to ratepayers' bills. The Commission should remove the nuclear mandate because it wrongfully incentivizes nuclear facilities to operate in an unprofitable mode.

Guarantee ratepayers' money is NOT used to subsidize methane gas companies. Ratepayers' money should NOT be used to build methane gas pipelines and gas infrastructures for the profit of private companies which are operating with increasing financial uncertainty and are proven to be large contributors to methane-caused global warming and climate disruption. In 2015, Massachusetts Attorney General Maura Healy commissioned a study on the need for new gas pipeline capacity because multiple companies all claimed they would supply the same need for gas in New England states. It was not plausible for multiple companies, proposing separate, new massive pipelines to supply the same supposed need. As it turned out, the study suggests that no new methane gas capacity is needed to ensure reliable power supply, and energy needs can be met through other means. The reference is : Paul J. Hibbard & Craig P. Aubuchon, Analysis Group, Inc., Power System Reliability in New England: Meeting Electric Resource Needs in an Era of Growing Dependence on Natural Gas (2015), *available at* <http://www.mass.gov/ago/docs/energy-utilities/reros-study-final.pdf>.

Build off-shore wind power. New York State has tremendous off-shore wind potential off the coast of Long Island. The Clean Energy Standard should commit to development and deployment of 5000MW of off-shore wind by 2025 and 10,000MW of off-shore wind by 2030. By increasing power generation closer to New York City, expensive transmission of power from upstate to New York City would be reduced, and off-shore wind power could replace uncompetitive nuclear power.

Build energy of the future. The way to achieve a renewable energy future is to build it and to retrofit for efficiency that reduces the amount of energy used. Neither nuclear or methane gas companies are part of our truly clean energy future. I object to co-opting of the term "clean" by these sectors. Over the lifetime of inception/extraction to decommission, both of these sectors produce irreparable harms to our environment and living things. Neither nuclear or methane gas power are needed as bridges to the future. New technologies for sustainable energy are here and ready now. Furthermore, jobs in renewable energy are growing well. According to the International Renewable Energy Agency, in 2015, in the United States, renewable energy jobs increased 6 per cent while employment in oil and gas decreased 18 per cent. http://www.irena.org/News/Description.aspx?NType=A&mnu=cat&PriMenuID=16&CatID=84&News_ID=1450

No funds should be diverted from renewable energy or energy efficiency programs to bail out financially unstable or financially failing technologies that are stuck in old, outdated mode.

Apply Clean Energy Standard to ALL. Finally, the Clean Energy Standard should apply to ALL utilities and local service providers, including NYPA, LIPA and municipal utilities. And, utilities should NOT own power generation.

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