



Petition from people living within the Cassadaga Wind Project

July 19, 2018

Dear Secretary Burgess,

As community members being forced to live within the borders or in close proximity to the Cassadaga Wind Project's [CW] industrial facility, we are hereby requesting a public hearing in regard to the PSC issuance of a CPCN. As residents who will be directly impacted by this project for generations, we believe we should be granted this important right.

We object to CW's request for an expedited review under 16 NYCRR §21.10. We are opposed to the granting of a CPCN application and likewise oppose CW's request that the public hearing be waived.

We believe the Project fails to meet the definition under *PSL Section 68: Certificate of Public Convenience and Necessity*, which requires that "the commission shall consider the economic feasibility of the corporation, the corporation's ability to finance improvements of a gas or electric plant, render safe, adequate and reliable service and provide reasonable rates, and whether issuance of a certificate is in the public interest."

The record shows CW has a Power Purchase Agreement with New England ISO. NYS will not receive the REC's. Logically, if the electricity is contracted to be sold out of state, it is not a necessity and not needed here. Eighteen months of construction, noise, dust, diesel truck traffic, followed by 20-30 years of unwanted noise, shadow flicker, loss of amenity, decreased property values and social discord, are NOT NEEDED, CONVENIENT OR IN THE PUBLIC INTEREST for those within the project's footprint.

The Siting Board Order deemed this project beneficial to NYS even with an out-of-state PPA, claiming it as a contribution to the RGGI. We respectfully argue that the RGGI is faulty

and has not proved effective. The main driver of lowered CO₂ levels is not the result of installing renewable energy, or cap and trade, but switching from coal to gas.¹

Contrary to what Cassadaga Wind claims — that this project is beneficial to the CES as it will decrease our natural gas dependence — the NYISO and studies from around the globe confirm industrial-scale wind energy KEEPS us gas dependent.²

The NYISO Wind Integration Study/Report points out that “higher levels of wind installation will require ADDITIONAL regulation [gas] resources and will experience higher magnitudes of ramping events [gas] . . . that regulation resources must be available at 75-80% to back-up wind [almost a 1:1 ratio].”

We recently learned that our Dunkirk NRG electric gas plant will not be repowered. It was essentially displaced in the NYISO interconnection queue by industrial wind projects in Chautauqua County and by other renewable projects in the pipeline. NRG's RELIABLE, efficient, dispatchable, 250+ permanent job-producing, baseload electric plant was replaced by inefficient, UNRELIABLE, non-dispatchable renewable energy projects, INCLUDING Cassadaga Wind. This project will likely result in only 2 FTE jobs (like EverPower's Howard Wind) and will ultimately add to increased electric rates for both taxpayers and ratepayers.

During the recent heat wave, without our reliable Huntley and NRG baseload plants, WNY paid the highest electricity rates in the state: WNY @ \$168.17 per MWh versus NY City @ \$82.78 MWh and Long Island @ \$84.30 MWh, according to NYISO zone maps and pricing.

NYISO Power Trends Report 2017, “A Tale of Two Grids,” exposes the major transmission constraints and enormous costs to fix the problem. Please note the following Syracuse News excerpt: “Simply put, most wind and hydroelectric power is produced in Northern and Western New York, where the supply of electricity exceeds demand. But two-thirds of all the state's power is used in the New York City-Long Island region.”

Transmission lines between the two areas are already overburdened and are not equipped to handle the anticipated growth in Upstate renewables, the report says.

ISO officials call it “a tale of two grids” that need to be joined.

¹ <https://instituteeforenergyresearch.org/analysis/rggi-a-faulty-model-for-successful-cap-and-trade/>

² https://www.washingtonpost.com/news/energy-environment/wp/2016/08/11/turns-out-wind-and-solar-have-a-secret-friend-natural-gas/?noredirect=on&utm_term=.9ee6efb5c2e4

Two major transmission projects — one in Western New York, another from Utica to the Hudson Valley — are in the planning stages. But it takes years to get such projects built, even when they are developed along existing transmission rights of way. And more new powerlines will likely be needed, according to Power Trends.

In addition to new transmission, the complex electric grid will need tinkering to make it ready for the renewable energy future, said Rich Dewey, executive vice president of the New York ISO. "There is not a single solution," Dewey remarked in an email. "Effectively addressing these issues will require a lot of parts working together."

Dewey says state officials should consider new pricing strategies to lure renewable energy facilities closer to the power-hungry Downstate region. New York's current subsidies for renewable power projects reward developers equally, regardless of where they are sited.

Why put the cart before the horse? With cost estimates of \$1 million per mile of transmission, local resistance, and the prospect of eminent domain to build this infrastructure, it's likely the Cassadaga Wind Project's turbines will be obsolete before the bottle-necked energy can even get through. What a waste of our wind-subsidizing tax dollars! As ratepayers, we will also bear this huge burden in the form of substantially higher electric bills.

Again, this does not fit the definition of convenient, reliable, affordable or a necessity for the citizenry.

Then there are our Amish neighbors. Three Amish homesteads unwittingly became abutters to turbines on Pick-up Hill Cherry Creek. (Now, 10 Amish residences in all.) These skyscraper-sized electric generators are certainly not a necessity or convenient for these humble, hard-working people who abstain from electric use to maintain their religious, simplistic, peaceful lifestyle.

Europe is rapidly phasing out subsidies for renewables.³ This is likely to impact the economic solvency of Terra Firma and Innogy. Innogy, recently spun off from financially troubled RWE, is untested in the USA thus far.

³<https://www.reuters.com/article/us-windpower-megaturbines-insight/wind-powers-big-bet-turbines-taller-than-skyscrapers-idUSKBN19I118>

We believe our voices should be heard.

Sincerely,

John and Jennifer Conway-Charlotte

John and Carol Yanni-Charlotte

Michael Shoemaker-Charlotte

Ed and Ruby Holtz-Charlotte

David and Chris Monteleone-Cherry Creek

James and Kursten Baldwin-Cherry Creek

Jean Zybert-Cherry Creek

Natalie Zybert -Cherry Creek

Chris Firkins-Cherry Creek

Audrey Giambrone-Cherry Creek

Jade Giambrone- Cherry Creek

Edna, Ronald and Eric Prince-Villanova

Sue Baldwin-Cherry Creek

Andrew Zybert Cherry Creek

Julie Delcamp-Villanova

Robin Delcamp -Villanova

Sandra Miniri-Villanova