

October 3, 2016

Hon. Kathleen H. Burgess
Secretary to the Commission
Three Empire State Plaza
Albany, New York 12223-1350

Kevin Casutto
Presiding Examiner
Three Empire State Plaza
Albany, New York 12223-1350

RE: GALLOO ISLAND WIND, LLC. 15-F-0327

Dear Secretary Burgess and Presiding Examiner Casutto:

I am writing about two concerns I have about fairness of this process in evaluating the value of Galloo Island Wind LLC.

On an August 1, 2016 Governor Andrew Cuomo announced¹, “The Clean Energy Standard will require 50 percent of New York's electricity to come from renewable energy sources like wind and solar by 2030, **with an aggressive phase in schedule over the next several years** (my emphasis).” The Article 10 siting process is the instrument by which the governor’s renewable energy plan will be implemented. The Article 10 Siting Board was given absolute power and authority deciding the merits of each energy proposal. The composition of the board is heavily weighted toward energy development, e.g., the Public Service Commission, NYSERDA and Empire State Development. Moreover, agency representatives are appointees of the governor and they have made public statements in support of his renewable energy agenda. For example, in the same August 1 news release the Chair of the Article 10 Siting Board, stated, “*New York is now on its way to '50 by 30' and even more renewable power will be within our reach.*” When an “aggressive phase in” is added to this predisposed mix of officials we have a recipe that favors developers and one that ultimately will ignore environmental and local concerns. It is obvious the balance is tipped, their foot is on the accelerator and none of it is fair.

The other issue is demographic fairness. What has been lacking in the discussion of the Clean Energy Standard to date is how much we in upstate New York have contributed to renewable energy production so far and why upstate should not be targeted for the “aggressive phase-in” of the Clean Energy Standard. The Siting Board and the record in the case of Galloo Wind LLC need to have a clearer understanding of where electric demand is greatest and where future renewable energy generation is needed the most. If you examine the state’s usage and

¹ <https://www.governor.ny.gov/news/governor-cuomo-announces-establishment-clean-energy-standard-mandates-50-percent-renewables>

generation data, an imbalance is evident where upstate areas are near the finish line in the “50% renewables by 2030” race, and where downstate renewable development has yet to leave the starting blocks.

Figure 27- Wind Power in New York: Map of Existing and Proposed Wind Projects – 2015

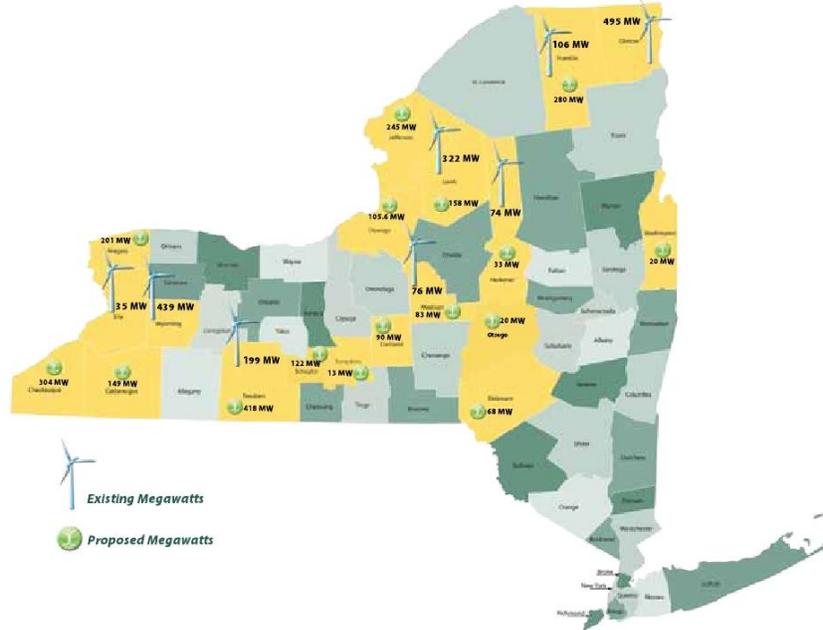


Figure 1 Distribution of industrial wind projects - NYISO, Power Trends 2015.

To quantify the imbalance, I used 2014 estimates of electric usage/demand reported by the New York Independent System Operator². I combined NYISO zones G through K (Lower Hudson, New York City and Long Island) into a single downstate zone and compared it with the remaining upstate zones. I used the U.S. Energy Information Administration website to access the 2014 New York electric generation data³, since the NYISO report provided no comparable generation data. Using EIA interactive mapping I was able to apportion the wind, solar and hydroelectric generation into upstate and downstate geographic areas⁴.

As expected, the geographic distributions of electric usage and generation from renewable energy sources show a major imbalance in the area of renewable electric energy generation within the state:

2014 Usage & Generation (MWhr)	Electric Usage	Renewable Generation	Percent Renewable
Upstate	67,142,000	29,542,257	44.0%
Downstate	92,917,000	583,668	0.6%
Total:	160,059,000	30,125,095	18.8%

²NYISO. 2015. Power Trends 2015: Rightsizing the Grid. 80pp.

³ <http://www.eia.gov/state/?sid=NY>

⁴ I used the proportions of “Total Summer Net Capacity” for hydro and solar and applied it to EIA-NY’s Table 5 “Total power industry generation by primary energy source , 1990 through 2014 New York.”

Most of New York's electric usage in 2014 was downstate, 58% of the total, but the area produces less than one percent of the power from renewable sources. In stark contrast, renewable electric generation in upstate represented 44% of the area's usage. The renewable sources upstate in 2014 were composed of 87% hydroelectric, 13% wind and a trace from solar. Hydroelectric resources, particularly Niagara and the St. Lawrence River, have long been major renewable energy sources for New York. The NYISO report had a higher estimate of 2014 renewable generation, 25%, although NYISO's estimate also included generation from "other" energy sources.

These data reveal something that has been ignored in the discussion of the Clean Energy Standard – the unfairness in the siting of wind projects statewide. All wind projects are located upstate and combined with existing hydroelectric generation upstate communities are within easy reach of the governor's goal of 50% renewables a lot sooner than by 2030. Downstate, by comparison, has not begun the process. The irony here is downstate residents consume 38% more electric energy, their elected officials adamantly support renewable energy policy, and at the same time there is no meaningful renewable energy production downstate. Furthermore, wind resources along New York's ocean front are among the best in the state. Albany and downstate officials seem content to focus all renewable development on upstate communities to reach the governor's goal of 50% renewables by 2030. It is obvious demographic fairness was never considered in the governor's news release on August 1, 2016.

To be more impartial, the Siting Board should reject the governor's charge for an aggressive phase-in of renewable projects in upstate areas, particularly in communities where proposals adversely impact sensitive environmental resources, such as Galloo Island, and where communities do not support project proposals. Instead, aggressive development efforts should be directed downstate. The focus upstate should be to protect valuable resources and communities and not diminish their importance in the name of an "aggressive phase-in" of the Clean Energy Standard.

Sincerely yours,

A handwritten signature in black ink, reading "Clifford P. Schneider". The signature is written in a cursive, flowing style.

Clifford P. Schneider
Pro Se