

October 7, 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:

This letter is an addendum to my October 4, 2016 letter.

I would like to correct the 2014 renewable generation data I provided in the table in my October 4 letter. Regarding generation data, I noted previously, *"I used the U.S. Energy Information Administration website to access the 2014 New York electric generation data<sup>1</sup>, since the NYISO report provided no comparable generation data."* Recently I found New York 2014 renewable energy data from a New York source, the Public Service Commission's 2016 white paper report on clean energy.<sup>2</sup>

The corrected results to the table, using both New York usage data from NYISO and generation data from the PSC, indicate a more disproportionate imbalance than I previously calculated:

<b>2014 Usage &amp; Generation (MWhr)</b>	<b>Electric Usage</b>	<b>Renewable Generation</b>	<b>Percent Renewable</b>
Upstate	67,142,000	<del>29,542,257</del> 39,532,545	44.0% <b>58.9%</b>
Downstate	92,917,000	<del>583,668</del> 1,763,117	0.6% <b>1.9%</b>
Total:	160,059,000	<del>30,125,095</del> 41,295,663	18.8% <b>25.8%</b>

<sup>1</sup> <http://www.eia.gov/state/?sid=NY>

<sup>2</sup> New York State Public Service Commission. Staff white paper on clean energy standard. Case No. 15-E-0302. January 25, 2016. 70pp. Appendix B, p.3.

I apportioned the generation of biomass and biogas according to the rated capacity of biomass facilities referenced on the U.S. Energy Information Administration website. I did the same for hydroelectric generation as well.

The corrected data indicate that **58.9% of New York's renewable electric energy produced in 2014 came from upstate power resources**, while downstate contributed just 1.9%. Consequently, upstate in 2014 exceeded the Clean Energy Standard mandate for 50% renewables by 2030. Eighty-seven percent (87%) of 2014 renewable generation came from consistent, long-standing hydroelectric sources, while intermittent wind (26% capacity factor) generated only 9% of the total renewable production.

The corrected case is even stronger that the "aggressive phase-in" of the clean energy standard should be directed downstate. The concluding paragraph from my earlier letter is still appropriate,

*"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 with a long, sweeping underline.

Clifford P. Schneider  
Pro Se