

October 17, 2016

Honorable Kathleen H. Burgess
Secretary of the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Re: Case Number 14-F-0485

Dear Ms. Burgess,

Please find the attached document titled, “Green Overload”. This document assesses the “Clean Energy Standard”, as adopted on August 1, 2016 by the New York State Public Service Commission and as directed by Governor Andrew Cuomo.

The Green Overload white paper was written by *Ken Girardin* – Policy Analyst at the Empire Center for Public Policy and *Annette Brocks* – Eugene du Pont Memorial Scholar at the University of Delaware.

The issues uncovered with the Clean Energy Standard expose significant weaknesses with the Standard, its premise, logic and conclusions.

As stated in the conclusion to Girardin and Brocks’ paper:

“New York residents and businesses are already paying some of the highest electricity prices in the nation. The Clean Energy Standard is likely to drive prices much higher while producing little, if any, progress towards the goal of reducing carbon dioxide emissions.”

This paper is especially pertinent, given the recent skyrocketing electric rates in Ontario after a misguided foray into industrial wind energy. We need to learn from the missteps of our neighbor to the north.

Please feel free to contact me with any questions you may have.

Sincerely,

John B. Riggi
Councilman, Town of Yates