



NEW YORK GEOTHERMAL ENERGY ORGANIZATION

**Hon. Michelle L. Phillips, Secretary
Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350
Email: secretary@dps.ny.gov**

**RE: Case 21-G-0576; Petition of Bluebird Renewable Energy, LLC for an
Original Certificate of Public Convenience and Necessity and Establishing a
Lightened Regulatory Regime; Supplemental Comments of the Sierra Club**

Dear Secretary Phillips:

New York Geothermal Energy Organization members would like to go on record as opposing the Bluebird Renewable Energy proposal to utilize methane from it's onsite bio-gas generation (currently used to produce onsite electricity), to create renewable natural gas which will be refined, processed and transported via truck and pipeline for combustion at an offsite location. NY-GEO members are supportive of profitable business enterprises which are both environmentally and economically sustainable, but believe the Bluebird Renewable Energy project is neither. Our reasons include:

More harmful methane will be emitted into the atmosphere. Using the correct CLCPA definition of methane's greenhouse gas potency over 20 years and accounting for the inevitable leaks that will occur during processing, transport and combustion, over 10,000 additional tons of carbon dioxide equivalents will be released. This calculation also factors in the logical fact that additional energy needed to do the extraction, processing and transport of renewable natural gas must come from offsite generation instead of wisely using the current on site generated electricity.

New York will not receive any real economic benefits from this project. Because Bluebird's proposal includes selling renewable energy credits to California's Low Carbon Fuel Standard in order to make this project economically profitable, New York will receive no economic or environmental benefit.

Allowing approval of the Bluebird Renewable Energy project will set a bad precedent for advancing New York's environmental and economic progress. Although this may seem to be a case with limited impact since it is for only two dairy farms, NY-GEO's concern is that it will set a precedent that will be used to establish the procedures used to evaluate many more similar applications in the future.

NY-GEO recognizes that a very active debate on the climate impacts of RNG utilization is ongoing within the NY Climate Action Council through its Alternative Fuels subgroup. The issues being explored by the Climate Action Council are germane to this proceeding and should be given a proper airing before a decision is made on this project.

New York Geothermal Energy Organization's board of directors, members and staff recommend rejection of this proposal. Please don't hesitate to contact me if you have any questions or comments.

Respectfully

John Rath

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**New York Geothermal Energy Organization, Inc. (NY-GEO)
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The New York Geothermal Energy Organization (NY-GEO) is a non-profit trade organization representing geothermal heat pump (GHP) installers, manufacturers, distributors, drillers, consultants and industry stakeholders from throughout New York State and beyond.