



PROTECT OUR COAST - LINY

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Environmental conservation organization created to protect our coastal communities and the surrounding waterways from industrialization to maintain resident's quality of life as well as preserving the rights of nature.

June 4, 2024

Hon. Michelle L. Phillips, Secretary
New York State Public Service Commission
3 Empire State Plaza
Albany, New York 12223-1350

Re: Case 15-E-0302 Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard

Protect Our Coast-Long Island New York (POC-LINY) is writing to support the filing by a coalition of groups and individuals titled "Stakeholder Comments Rural NY Communities" submitted in the above case on November 2, 2023.¹

Following our submission of the Whitestrand Consulting report *Economic Analysis of the Empire Wind 1 Project Re-Bid Award*, we wish to reiterate that New Yorkers are still waiting for a fiscal study demonstrating that state policy will guarantee equitable rates. To date, there has been no substantive economic analysis to show that the state's planned renewable buildout will be affordable to taxpayers or ratepayers. Equinor Empire Wind 1 has rebid its project at a higher strike price, imposing an additional burden on New Yorkers without a standard cost-benefit analysis from NYSERDA. Meanwhile, no dispatchable emission-free resource has been identified as backup for intermittent generation, despite NYISO predicting that 25 to 45 gigawatts will be needed. Although the E.F. Barrett plant is proposed to "transfer" electricity from offshore wind, it will still burn natural gas.

With respect to climate goals, New York has gone backwards with more fossil fuels being burned for electricity today than since the CLCPA became law. In fact, due to the premature closure of Indian Point, our state is responsible for over ten million tons of avoidable greenhouse gas emissions each year. Consequently, both NYPA and NYISO acknowledge that fossil fuel plants, including peakers, cannot be shuttered without jeopardizing service. Electricity demand could double in the future, yet reliable electricity cannot even be guaranteed next year with NYISO warning that New York City could experience nearly half a gigawatt capacity shortfall even in normal weather. NYSERDA and NYISO both admit that solar, wind, and battery storage will not ensure a reliable grid, and NYISO predicts that margins could shrink even more in the future. Still, utilities are being forced to support subsidies for intermittent renewables while many ratepayers are in arrears. In terms of protecting communities across upstate New York and Long Island—as well as consumers statewide—the CLCPA is failing.

According to the North American Energy Reliability Commission (NERC), the two greatest risks to the bulk power system are bad energy policy and grid changes made to implement bad policy.² New Yorkers expect and deserve an energy plan based on science, not slogans. We need reliable, affordable electricity that does not undermine human health and quality of life. New York should rethink plans to blanket the state and coastline with intermittent, underperforming sources of energy, and instead invest in reliable carbon-free alternatives.

Christina Kramer
Protect Our Coast, Long Island New York

¹ <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={60AA918B-0000-C810-BCF8-2525B8218AF2}>

² [https://www.nerc.com/comm/RISC/Related%20Files%20DL/RISC ERO Priorities Report 2023 Board Approved Aug 17 2023.pdf](https://www.nerc.com/comm/RISC/Related%20Files%20DL/RISC%20ERO%20Priorities%20Report%202023%20Board%20Approved%20Aug%2017%202023.pdf)