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The New York Association of Public Power (NYAPP) is composed of nine municipal electric utilities and four rural electric cooperatives. These public power entities are not-for profit, owned by their consumers and provide reliable, low-cost environmentally compatible power for their customers. These utilities are leaders in implementing energy efficiency programs and facilitating economic development in their communities. We believe that a primary focus of the 2013 Energy Plan should be the impact of the electric industry restructuring on consumers in New York State. Although the draft scope of the 2013 Energy Plan references cost, it does not adequately address the impacts of restructuring, and does not reference consideration of the New York Independent System Operator (NYISO), which administers the restructured markets in NY. NYAPP respectfully requests that the 2013 Energy Planning Board critically examine the NYISO practices and resulting impacts on consumers in New York. New Yorkers continue to pay some of the highest electricity costs in the country, dramatically impacting the economic vitality of many regions in the state. The NYISO must administer the states wholesale electricity markets with consideration of the costs to consumers, with transparency and without with real accountability to the people of New York.