



October 9, 2009

Mr. Thomas C. Congdon
Executive Director
Energy Coordinating Working Group – State Energy Plan
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, New York 12224

Subject: Comments on State Energy Plan Interim Report

Dear Mr. Congdon:

IdaTech, LLC is pleased to provide comments regarding the subject Report. IdaTech is a developer and manufacturer of Fuel Cell Power Systems that are deployed globally on a commercial basis. The company is headquartered in Bend, Oregon and has 95 U.S. employees.

The work of the Energy Coordinating Working Group is evident in the quality of the Interim Report; we appreciate this work, and the Energy Plan that will derive from it.

We support the policy regarding the development and deployment of renewable resources in the State of New York. New York is one of a handful of states, through the acceptance by the New York Public Services Commission that appreciates the contribution of fuel cell power systems to a renewable energy portfolio. The State Energy Plan, however, does not reflect this appreciation. Fuel cell systems – as a function of their near-zero emissions and high system efficiencies – are renewable energy sources. Also, IdaTech is working with renewable fuels developers to prepare biofuels that may be readily consumed by fuel cell power systems to increase their contribution to clean energy generation. Accordingly, IdaTech encourages the Energy Coordinating Working Group to include fuel cell power systems in the definition of renewable energy sources.

Fuel cell power systems are commercially available in a variety of installed capacities, from watts to megawatts. IdaTech's family of commercial systems generally support backup power applications, such as telecommunications Base Transceiver Stations (there are approximately 210,000 in the U.S. alone), signaling and sensor applications. Accordingly, they represent excellent point-of-use power sources for loads ranging from a kilowatt to fifteen kilowatts. Fuel cell power systems of this size range are being deployed by IdaTech and other U.S. fuel cell



companies now by the thousands annually, and will expand to tens of thousands within a year. Thus, their impact to environmental cleanup goals is considerable. We recommend that fuel cell power systems be included as a contributor to the 80 by 50 Greenhouse Gas emissions reduction initiative.

We encourage that the Interim Report contain a section regarding the significant contribution of fuel cell power systems in New York's long-term energy planning. Point-of-use renewable fuel cell power systems enable users to replace aging, expensive to maintain, and polluting diesel generators and battery banks. For example, following Hurricane Katrina's landfall, primary and backup power systems to telecommunication sites were decimated; first responders were without communications capability needed for emergency coordination and effective response. Similar situations follow significant snow and ice storms, tornadoes and potentially, human-caused disasters. Fuel cell power systems offer a quantum improvement in reliability and availability for backup power capability. These facts merit serious consideration of fuel cell power system inclusion in long-term energy planning.

Further, in the aggregate, fuel cell power systems become a tool in the utility kit of alternative and renewable power supporting their need to meet RPS requirements. These systems enable utilities to deploy point-of-use clean power generation where it is not feasible or possible to expand grid infrastructure for serving the increasing power needs of urban and suburban customers.

The inherent capabilities and performance aspects of fuel cell power systems support the argument for including fuel cell power systems in the State Energy Plan as renewable energy power sources, and as an important contributor for long-term energy planning.

We appreciate the opportunity to provide these comments.

Respectfully submitted,

IdaTech, LLC

A handwritten signature in black ink that reads "Eric L. Simpkins".

Eric Simpkins

Vice President – Business Development & Government Affairs

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